Annex 1.

New gTLD Application Submitted to ICANN by: Booking.com B.V.

String: hotels

Originally Posted: 13 June 2012

Application ID: 1-1016-75482

Applicant Information

1. Full legal name

Booking.com B.V.

2. Address of the principal place of business

Contact Information Redacted

3. Phone number

Contact Information Redacted

4. Fax number

Contact Information Redacted

5. If applicable, website or URL

http:⁄⁄www.booking.com

Primary Contact

6(a). Name

Mr. Winston Fuhriman

6(b). Title

Manager, Domain Services

6(c). Address

6(d). Phone Number

Contact Information Redacted

6(e). Fax Number

Contact Information Redacted

6(f). Email Address

Contact Information Redacted

Secondary Contact

7(a). Name

Mr. Rutger Prakke

7(b). Title

General Counsel

7(c). Address

7(d). Phone Number

Contact Information Redacted

7(e). Fax Number

Contact Information Redacted

7(f). Email Address

Contact Information Redacted

Proof of Legal Establishment

8(a). Legal form of the Applicant

Limited liability company

8(b). State the specific national or other jursidiction that defines the type of entity identified in 8(a).

The Netherlands

8(c). Attach evidence of the applicant's establishment.

Attachments are not displayed on this form.

9(a). If applying company is publicly traded, provide the exchange and symbol.

9(b). If the applying entity is a subsidiary, provide the parent company.

Priceline.com Bookings Acquisition Company Limited

9(c). If the applying entity is a joint venture, list all joint venture partners.

Applicant Background

11(a). Name(s) and position(s) of all directors

Darren Huston	Director
Glenn Fogel	Director
Olivier Bisserier	Director
Rutger Prakke	General Counsel

11(b). Name(s) and position(s) of all officers and partners

Darren Huston	Chief Executive Officer
Olivier Bisserier	Chief Financial Officer

11(c). Name(s) and position(s) of all shareholders holding at least 15% of shares

Priceline.com Bookings Acquisition Company Limited	Not Applicable

11(d). For an applying entity that does not have directors, officers, partners, or shareholders: Name(s) and position(s) of all individuals having legal or executive responsibility

Applied-for gTLD string

13. Provide the applied-for gTLD string. If an IDN, provide the U-label.

hotels

14(a). If an IDN, provide the A-label (beginning with "xn--").

14(b). If an IDN, provide the meaning or restatement of the string in English, that is, a description of the literal meaning of the string in the opinion of the applicant.

14(c). If an IDN, provide the language of the label (in English).

14(c). If an IDN, provide the language of the label (as referenced by ISO-639-1).

14(d). If an IDN, provide the script of the label (in English).

14(d). If an IDN, provide the script of the label (as referenced by ISO 15924).

14(e). If an IDN, list all code points contained in the U-label according to Unicode form.

15(a). If an IDN, Attach IDN Tables for the proposed registry.

Attachments are not displayed on this form.

15(b). Describe the process used for development of the IDN tables submitted, including consultations and sources used.

15(c). List any variant strings to the applied-for gTLD string according to the relevant IDN tables.

16. Describe the applicant's efforts to ensure that there are no known operational or rendering problems concerning the applied-for gTLD string. If such issues are known, describe steps that will be taken to mitigate these issues in software and other applications.

As is the case with any new TLD that is added to the DNS root zone, some general technical acceptance issues with the delegation of this TLD are to be expected, which are entirely unrelated to the .hotels extension.
The Applicant has consulted various experts in the field of domain names, including – in particular – its selected back-end registry operator, who has a significant experience in introducing new TLDs to the DNS root, including .BIZ, .US, and .CO.

According to these parties, no particular issues with respect to this gTLD string are to be expected, since .hotels is a string that entirely consists of standard US ASCII characters, as is the case with most extensions currently available in the DNS. Furthermore, the length of the string is within the character restrictions that have been defined within the DNS.

Therefore, to the Applicant's best knowledge and belief, no specific issues are to be expected as regards the operation and rendering of the .hotels gTLD.

17. (OPTIONAL) Provide a representation of the label according to the International Phonetic Alphabet (http://www.langsci.ucl.ac.uk/ipa/).

Mission/Purpose

18(a). Describe the mission/purpose of your proposed gTLD.

Booking.com BV, a subsidiary of Priceline.com (Nasdaq:PCLN), is the No.1 online hotel reservations agency in the world, in terms of the number of online hotel room nights sold. Booking.com is dedicated to offering the best rates for all of the accommodation offered, attracting over 30 million unique visitors each month via the Internet from both leisure and business markets worldwide.

Established in 1996, Booking.com BV offers competitive rates for any type of property, ranging from small independent hotels to a five star luxury. The Booking.com website is available in 41 languages and offers more than 168,000 affiliated hotels in 160 countries around the world.

Booking.com B.V. is based in Amsterdam, the Netherlands, and is supported internationally by offices in: Amsterdam - Athens - Auckland - Bangkok - Barcelona - Berlin - Brussels - Buenos Aires - Cambridge - Cape Town - Casablanca - Chicago - Copenhagen - Dubai - Dublin - Edinburgh - Grand Rapids - Hong Kong - Honolulu - Houston - Innsbruck - Istanbul - Kuala Lumpur - Las Palmas de Gran Canaria - Las Vegas - Lille - Lisbon - London - Loulé (PT) - Lyon - Madrid - Málaga - Mexico City - Miami - Milano - Montréal - Moscow - Munich - New York - Nice - Norwalk - Orlando - Oslo - Paris - Prague - Riga - Rome - San Francisco - São Paulo - Shanghai - Singapore - Stockholm - Sydney - Tokyo - Vancouver - Venice - Vienna - Warsaw - Zagreb - Zürich.

Through its website, www.booking.com, Booking.com has built over the years an impressive brand, with a global exposure and a truly international clientele.

According to the Applicant, the purpose of the .hotels TLD may be manifold. A few of the main purposes currently intended are:

i. Pioneer the highly recognizable .hotels gTLD in order to further support its day-to-day activities, for the benefit of the Applicant, its affiliates, including hotels and hotel chains for which Booking.com provides hotel reservation services;

ii. Provide stakeholders of the Applicant, including subsidiaries, hotel partners, affiliate partners, users, and their respective directors, officers, employees, with

a recognizable and trusted identifier on the Internet, creating additional level playing fields for the hotel industry under the authority of a prominent player in the hotel reservation marketplace. Such stakeholders may include, but are not limited to:

* its subsidiaries in various countries;
* business affiliates and partners, including individual hotels and hotel chains;
* prospective and current customers; and
* directors, officers and employees of the Applicant, its subsidiaries, hotel partners or business affiliates.

iii. Provide such stakeholders with a secure and safe Internet environment that is mainly or even fully under the control of the Applicant and its subcontractors;

iv. Providing customers of Booking.com and holders of domain name registrations in the .hotels gTLD with a service that aims at putting users first;

v. Offering multilingual hotel reservation services that are directly or indirectly accessible under specific domain names registered in the .hotels gTLD, referring to, amongst others, names of hotels, geographic locations in which affiliate hotels can be found, hotel categories, etc.

This just gives an idea of how Booking.com could use .hotels in the future. In the beginning, and until further developing a detailed plan to use this new gTLD, Booking.com's intention is to implement a single registrant TLD.

18(b). How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

Booking.com intends to organize the registry operation for the .hotels gTLD in such a manner that it will minimize the likelihood of having multiple applications or registration requests for a particular domain name.

According to the Applicant, Booking.com, this can be achieved in any of the following ways, which likely needs to be further refined following ICANN's award and delegation of the .hotels gTLD to Booking.com:

i. From the Applicant's perspective, .hotels may bring a high degree of recognition and specialization to the currently existing name space. Where in most cases the specific connotation that has been initially given to the gTLDs (or even ccTLDs) has disappeared, the .hotels top-level domain is currently intended to be unambiguous as regards:

* the identity of Booking.com as the Registry Operator;
* the source of the content and services offered under the .hotels gTLD, by Booking.com and/or a third party appointed by the latter;
* the affiliation between the Registry Operator and the .hotels gTLD, as well as the domain names registered in such gTLD; and
* in term, and at the discretion of Booking.com, the affiliation between the Registry Operator and any third party that may become authorized by Booking.com to register and/or use one or more domain name registrations in the .hotels gTLD, to be delegated and/or using such domain name registrations, providing content under such domain names and/or hotel reservations services.

ii. As mentioned in the vision and mission statement above, the key reasons why Applicant is applying for .hotels include but are not limited to:

1. Operate the highly recognizable .hotels gTLD at the top-level of the DNS' hierarchy, for the benefit of the Applicant and the various stakeholders supported by the Applicant in its current day-to-day activities;

2. Safety and security; and

3. Implement measures – in the near or distant future and when more adequate tools and techniques become available – to mitigate and even avoid abuse, phishing, and even counterfeiting and piracy.

However, a further detailled plan on how the Applicant will use this gTLD has not been developed so far, which is mainly due to the short time frame between the announcement of the roll-out of the New gTLD Program, and the actual opening of the application window.

iii. The Applicant intends to implement the following policies and procedures with respect to the registration of domain names in the .hotels top-level domain:

(i) reservation and registration of domain names in the name of Booking.com. It is likely that this will be the scenario that Booking.com will put in place during the first months or even years of operation of the .hotels gTLD.

These names may include, but are not limited to:
a. descriptive names, referring to the actual day-to-day business activities of the Applicant or its Affiliates;
b. descriptive names, referring to the internal departments of the Applicant;
c. descriptive names, referring to the subsidiaries, affiliates and∕or partners of the Applicant;
d. potentially also names relating to other stakeholders of Booking.com, to be determined by Booking.com following ICANN's award and delegation of the .hotels gTLD to Booking.com;
e. etc.

(ii) launch of the TLD: if and when implemented by the Registry Operator, this is likely going to be a gradual process, whereby selected third parties that meet certain criteria, which Booking.com will be entitled to set at its own discretion, may register domain names in the .hotels gTLD. These processes may include the following:

a. Sunrise: allow physical persons, organizations and entities that meet the eligibility requirements determined by Booking.com at that point in time to choose and, where allowed by Booking.com, to register the domain names that are identical to their trademarks. These parties are generally expected to include hotels and hotel chains, and the corresponding domain names would then include the names of hotels, hotel chains, including or excluding their geographic location;

b. Land rush and general availability: other available domain names may be registered by physical persons, organizations and entities that meet the eligibility requirements in force at that point in time to choose the domain names in accordance with the applicable terms and conditions.

Depending on the terms and conditions in force at the time of launch of the TLD, these domain names may or may not be registered in the name of the applicant for the domain name or in the name of the Registry Operator of the TLD (i.e., Booking.com). In any case, Booking.com reserves the right to impose additional and other restrictions from time to time at its sole discretion. These restrictions will be mainly inspired by the following elements and factors:

a. protecting and safeguarding the Applicant's brand and reputation;

b. the willingness to safeguard the trustworthiness of the .hotels gTLD, especially because of the fact that it will be operated by a respectable company;

c. the Applicants plan to provide users of the .hotels gTLD with a safe and secure experience; and

d. providing hotels and affiliates with a new indirect or – perhaps in the longer term – a more direct platform to promote themselves in the safe and secure .hotels online environment.

iv. Given the fact that the Applicant is a company that is established in the Netherlands, it is subject to both European and national privacy and data protection rules and practices. In particular, given the fact that the European and Dutch data protection authorities have issued strict guidelines, Booking.com will at all times be obliged to carefully consider and, where applicable, implement these policies, and this prior to and during the operation of the .hotels gTLD.

v. At this stage, Booking.com has not developed concrete and tangible plans in order

to develop specific domain name registration activities in the .hotels gTLD apart
from the activities described above. However, it is clear that the Applicant intends
to operate the .hotels gTLD to the joint benefit of the Applicant, its affiliates,
business partners and customers. In this respect, the Applicant has different ways
in order to make existing and future customers, visitors and stakeholders aware of
the (gradual) development of a new online environment under the .hotels TLD,
including but not limited to:

a. Direct and indirect marketing and branding initiatives;
b. Internet advertising campaigns, including paid search, pay-per-click advertising,
etc.;
c. Using its current on line presences, including various URLs under the Applicant's
key Booking.com domain name, in order to drive Internet traffic towards domain name
registrations in the .hotels gTLD, hereby promoting this new space, provide relevant
content with respect to hotels and hotel reservations, and the opportunity to make
such reservations by way of a secured platform;
d. Email marketing campaigns;
e. etc.

18(c). What operating rules will you adopt to eliminate or minimize social costs?

In line with Booking.com's mission and purpose for the .hotels gTLD, it is first and
foremost important for Booking.com to be able to operate the .hotels name space in a
stable, secure and responsible manner, putting the interests of users first.
Therefore, Booking.com will, if and when awarded the .hotels TLD by ICANN, devise
clear and detailed policies and procedures to that effect.

However, considering the fact that the actual award and delegation of the .hotels
gTLD to Booking.com is subject to the successful evaluation of our application, we
have not yet defined in detail:

* the types of domain names that will be registered;
* who will be entitled to select which domain names will be registered
* who will be entitled to register such domain names;
* who will be entitled to use such domain names, and;
* which types of use will be allowed or recommended.

As we believe that the development and implementation of one or more business cases
could likely take a couple of months or even years, we have only focused on a number
of high-level characteristics of our plans in relation to the operation of the
.hotels gTLD, as described above.

By all means, it is in Booking.com's self-interest to, on the one hand, make the
most of this initiative, promote its own business interests together with those of
its key affiliates, business partners, hotels and hotel chains, whilst mitigating
risks for the brands and brand reputation of such stakeholders and reducing the
(social) costs for others.

In this context, Booking.com will devise policies that encompass and comprise the
following features:

At least during the initial months or even years following the delegation of the
.hotels gTLD to Booking.com, this extension is likely going to be a so-called
"single registrant TLD" as contemplated by ICANN in Article 4.5 of the template
Registry Operator Agreement ("Transition of Registry upon Termination of
Agreement"). For the avoidance of doubt, a "single registrant TLD" is a TLD where
"(i) all domain name registrations in the TLD are registered to, and maintained by,
Registry Operator for its own exclusive use, and (ii) Registry Operator does not
sell, distribute or transfer control or use of any registrations in the TLD to any
third party that is not an Affiliate of Registry Operator."

Therefore, parties who are not Booking.com or – insofar and to the extent
Booking.com deems appropriate – an Affiliate within the meaning of the Registry
Operator Agreement will not be entitled to register domain names in the .hotels
gTLD.

Booking.com believes this to be in line with two of the main elements in its vision and mission statement, namely:

* Protecting and safeguarding the .hotels gTLD, by keeping full control over the entire operation of the .hotels registry and most if not all domain names registered therein; and

* Guaranteeing to Booking.com's key stakeholders who are interacting with Booking.com by using domain name registrations in .hotels that they are in fact interacting with the brand owner or its authorized Affiliates or business partners.

Consequently, there will be no (social) costs for non-eligible (third) parties, given the fact that they will be unable to register domain names in the .hotels gTLD in the first place.

However, even if only Booking.com will be entitled to register domain names, this does not exclude the hypothesis that disputes may arise with one or more third parties as regards domain names that are registered in the .hotels gTLD.

In order to avoid these risks, Booking.com intends to implement the following policies and processes:

First, the domain names to be registered by Booking.com could relate to the following:

* registered trademarks of Booking.com;
* names of affiliates and∕or hotel partners of Booking.com;
* names of departments within Booking.com, and its subsidiaries;
* etc.

Furthermore, Booking.com envisages registering a fair number of generic words that are directly or indirectly related to the day-to-day business activities and operations of Booking.com and its Affiliates.

Prior to effectively registering such domain names in the .hotels gTLD, Booking.com will require its legal department to review the list of these domain names on a regular basis in order to satisfy itself that they will not infringe the rights of third parties.

In any case, Booking.com shall claim to have a legitimate interest in these domain names, as they are merely descriptive of the activities, products or services of Booking.com. So even if one or more of these domain names would be protected by a registered trademark, held by a third party, it is likely that a claim under the Uniform Dispute Resolution Policy or Uniform Rapid Suspension policy will fail.

As regards the names referred to in Specification 5 to the template Registry Operator Agreement, Booking.com will follow the processes and procedures established by ICANN and the Governmental Advisory Committee.

If Booking.com would determine, at its sole discretion, that it will gradually allow certain categories of stakeholders to register domain names in the .hotels gTLD in their own name, Booking.com will devise policies to that effect.

However, Booking.com will at all times be entitled to restrict, limit or expand, among others:

* the category or categories of stakeholders who will be entitled to register one or more domain names in the .hotels gTLD, including their criteria for qualification;
* the choice of domain name(s) registered in the .hotels gTLD by and per such eligible stakeholder (category);
* the use made by an and per eligible stakeholder of a domain name registered in the .hotels gTLD;
* the transfer of domain names registered in .hotels;
* etc.

Booking.com shall reserve the right to subject the registration or use of a domain name to internal approval processes and procedures, at each and every step of the domain name life cycle.

Given the fact that Booking.com may release such available domain names post launch in a highly controlled manner, this also reduces the likelihood that two or more applicants qualify for the registration of the same domain name in the .hotels top-level domain;

As a method of last resort, and subject to the actual domain name registration policy adopted by the Registry Operator and in force at the time of registration, domain names will be allocated on a first-come, first-served basis.

In any event, Booking.com reserves the right to change or restrict any policies, procedures and practices at any point in time, especially if it is of the opinion that, e.g. there would be a risk that the reputation of the Booking.com brand or the brands of its stakeholders would be damaged.

It could be possible that the Applicant decides to make the .hotels top-level domain available to qualifying domain name registrants at an acceptable cost to them. Furthermore, Booking.com reserves the right to bundle certain products and services, such as hotel reservation and reservation modules with the registration of domain names in the .hotels gTLD. Furthermore, Booking.com may offer additional services that intend to drive Internet traffic from URLs operated by Booking.com towards domain names registered, controlled, and∕or operated by such third parties.

So, in brief:

1. The Applicant ∕ Registry Operator may reserve, delegate and use a potentially large number of domain names that are directly or indirectly relevant to Applicant's business in its own name. Since some of these domain names could be of a descriptive nature, the chances for qualifying ∕ eligible applicants ∕ registrants to register such domain names after the launch will be limited;

2. The Registry Operator shall be entitled at all times to release available domain names post launch in a highly controlled manner, which also reduces the likelihood that two or more applicants qualify for the registration of the same domain name in the .hotels top-level domain;

3. As a method of last resort, and subject to the actual domain name registration policy adopted by the Registry Operator and in force at the time of registration, domain names will be allocated on a first-come, first-served basis, however always taking into account the rights and legitimate interests of third parties, including but not limited to trademark rights;

4. The Applicant may make the .hotels top-level domain available to qualifying domain name registrants at an acceptable cost to them, to be determined if and when the Applicant would decide at its own discretion to allow third parties to register domain names, and – as the case may be – bundle such domain name registrations with additional added-value products and services generally offered by Booking.com in the course of its ordinary business activities, like operating the so-called "Bookit button", which is a tool that can be integrated in websites, and whereby customers can make direct hotel reservations through Booking.com's secure online transaction systems;

5. If the Applicant ∕ Registry Operator will be required to increase the fees for the registration of domain names, such increases are intended to keep pace with comparable market rates for such domain name registrations. However, the Registry Operator shall at all times be entitled to bundle the registration of domain names with other products or services offered by or on behalf of Booking.com at a fee to be set by the Registry Operator.

Community-based Designation

19. Is the application for a community-based TLD?

No

20(a). Provide the name and full description of the community that the applicant is committing to serve.

20(b). Explain the applicant's relationship to the community identified in 20(a).

20(c). Provide a description of the community-based purpose of the applied-for gTLD.

20(d). Explain the relationship between the applied-for gTLD string and the community identified in 20(a).

20(e). Provide a description of the applicant's intended registration policies in support of the community-based purpose of the applied-for gTLD.

20(f). Attach any written endorsements from institutions/groups representative of the community identified in 20(a).

Attachments are not displayed on this form.

Geographic Names

21(a). Is the application for a geographic name?

No

Protection of Geographic Names

22. Describe proposed measures for protection of geographic names at the

second and other levels in the applied-for gTLD.

Given the fact that the Applicant is a hotel reservation agent, it has a vested interest in giving its visitors and clients a clear and predictable naming scheme in the .hotels gTLD. Since visitors and clients are mainly looking for hotel reservations on the basis of their geographic destination, the Applicant may indeed develop plans in order to register domain names that exclusively contain geographic names (country names, city names, names of regions, etc.).

However, if such domain names will be registered, the Applicant will do so considering the following confines:

(i) these domain names will be exclusively registered in the name of the Applicant ⁄ Registry Operator, and not in the name of a third party that is not controlled by the Applicant ⁄ Registry Operator, unless agreed upon otherwise with the authority competent for giving its consent in accordance with Specification 5 of the Registry Agreement;

(ii) where consents are required prior to the registration and use of a domain name referred to and in accordance with Specification 5 of the Registry Agreement, the Applicant will obtain such consents before actually registering, delegating and using these domain names.

In any case the registration, delegation and use of domain names corresponding to geographic names will at all times be done in the best interest of:

- the Applicant and its business as a hotel reservation agent; and

- in order to directly and indirectly promote hotel reservations, local tourism and business in the geographic locations of which the name has been registered in accordance with (i) above.

Registry Services

23. Provide name and full description of all the Registry Services to be provided.

Response to Question 23 - Registry Services

23.1 Introduction

Booking.com has elected to partner with Neustar, Inc, to provide back-end services for the .hotels registry. In making this decision, Booking.com recognized that Neustar already possesses a production-proven registry system that can be quickly deployed and smoothly operated over its robust, flexible, and scalable world-class infrastructure. These existing registry services will be leveraged for the .hotels registry. The following section describes the registry services to be provided.

23.2 Standard Technical and Business Components

Neustar will provide the highest level of service while delivering a secure, stable and comprehensive registry platform. Booking.com will use Neustar's Registry Services platform to deploy the .hotels registry, by providing the following Registry Services (none of these services are offered in a manner that is unique to .hotels):

- Registry-Registrar Shared Registration Service (SRS)
- Extensible Provisioning Protocol (EPP)
- Domain Name System (DNS)
- WHOIS
- DNSSEC

- Data Escrow
- Dissemination of Zone Files using Dynamic Updates
- Access to Bulk Zone Files
- Dynamic WHOIS Updates
- IPv6 Support
- Rights Protection Mechanisms
- Internationalized Domain Names (IDN).

The following is a description of each of the services.

23.2.1 SRS

Neustar's secure and stable SRS is a production-proven, standards-based, highly
reliable, and high-performance domain name registration and management system. The
SRS includes an EPP interface for receiving data from registrars for the purpose of
provisioning and managing domain names and name servers. The response to Question
24 provides specific SRS information.

23.2.2 EPP

The .hotels registry will use the Extensible Provisioning Protocol (EPP) for the
provisioning of domain names. The EPP implementation will be fully compliant with
all RFCs. Registrars are provided with access via an EPP API and an EPP based Web
GUI.   With more than 10 gTLD, ccTLD, and private TLDs implementations, Neustar has
extensive experience building EPP-based registries. Additional discussion on the
EPP approach is presented in the response to Question 25.

23.2.3 DNS

Booking.com will leverage Neustar's world-class DNS network of geographically
distributed nameserver sites to provide the highest level of DNS service.   The
service utilizes "Anycast" routing technology, and supports both IPv4 and IPv6.
The DNS network is highly proven, and currently provides service to over 20 TLDs and
thousands of enterprise companies. Additional information on the DNS solution is
presented in the response to Questions 35.

23.2.4 WHOIS

Neustar's existing standard WHOIS solution will be used for the .hotels. The
service provides support for near real-time dynamic updates. The design and
construction is agnostic with regard to data display policy and is flexible enough
to accommodate any data model. In addition, a searchable WHOIS service that complies
with all ICANN requirements will be provided. The following WHOIS options will be
provided:

Standard WHOIS (Port 43)
Standard WHOIS (Web)
Searchable WHOIS (Web)

23.2.5 DNSSEC

An RFC compliant DNSSEC implementation will be provided using existing DNSSEC
capabilities. Neustar is an experienced provider of DNSSEC services, and currently
manages signed zones for three large top level domains: .biz, .us, and .co.
Registrars are provided with the ability to submit and manage DS records using EPP,
or through a web GUI. Additional information on DNSSEC, including the management of
security extensions is found in the response to Question 43.

23.2.6 Data Escrow

Data escrow will be performed in compliance with all ICANN requirements in
conjunction with an approved data escrow provider.   The data escrow service will:

- Protect against data loss
- Follow industry best practices
- Ensure easy, accurate, and timely retrieval and restore capability in the event of
a hardware failure
- Minimizes the impact of software or business failure.

Additional information on the Data Escrow service is provided in the response to Question 38.

23.2.7 Dissemination of Zone Files using Dynamic Updates

Dissemination of zone files will be provided through a dynamic, near real-time process. Updates will be performed within the specified performance levels. The proven technology ensures that updates pushed to all nodes within a few minutes of the changes being received by the SRS.   Additional information on the DNS updates may be found in the response to Question 35.

23.2.8 Access to Bulk Zone Files

Booking.com will provide third party access to the bulk zone file in accordance with specification 4, Section 2 of the Registry Agreement. Credentialing and dissemination of the zone files will be facilitated through the Central Zone Data Access Provider.

23.2.9 Dynamic WHOIS Updates

Updates to records in the WHOIS database will be provided via dynamic, near real-time updates. Guaranteed delivery message-oriented middleware is used to ensure each individual WHOIS server is refreshed with dynamic updates. This component ensures that all WHOIS servers are kept current as changes occur in the SRS, while also decoupling WHOIS from the SRS. Additional information on WHOIS updates is presented in response to Question 26.

23.2.10 IPv6 Support

The .hotels registry will provide IPv6 support in the following registry services: SRS, WHOIS, and DNS∕DNSSEC. In addition, the registry supports the provisioning of IPv6 AAAA records. A detailed description on IPv6 is presented in the response to Question 36.

23.2.11 Required Rights Protection Mechanisms

Booking.com, will provide all ICANN required Rights Mechanisms, including:

- Trademark Claims Service
- Trademark Post-Delegation Dispute Resolution Procedure (PDDRP)
- Registration Restriction Dispute Resolution Procedure (RRDRP)
- UDRP
- URS
- Sunrise service.

More information is presented in the response to Question 29.

23.2.12 Internationalized Domain Names (IDN)

IDN registrations are provided in full compliance with the IDNA protocol. Neustar possesses extensive experience offering IDN registrations in numerous TLDs, and its IDN implementation uses advanced technology to accommodate the unique bundling needs of certain languages. Character mappings are easily constructed to block out characters that may be deemed as confusing to users. A detailed description of the IDN implementation is presented in response to Question 44.

23.3 Unique Services

Booking.com will not be offering services that are unique to .hotels.

23.4 Security or Stability Concerns

All services offered are standard registry services that have no known security or stability concerns. Neustar has demonstrated a strong track record of security and stability within the industry.

Demonstration of Technical & Operational Capability

24. Shared Registration System (SRS) Performance

Response to Question 24 - Shared Registration System (SRS) Performance

24.1 Introduction

Booking.com has partnered with Neustar, Inc, an experienced TLD registry operator, for the operation of the .hotels Registry. The applicant is confident that the plan in place for the operation of a robust and reliable Shared Registration System (SRS) as currently provided by Neustar will satisfy the criterion established by ICANN.

Neustar built its SRS from the ground up as an EPP based platform and has been operating it reliably and at scale since 2001. The software currently provides registry services to five TLDs (.BIZ, .US, TEL, .CO and .TRAVEL) and is used to provide gateway services to the .CN and .TW registries. Neustar's state of the art registry has a proven track record of being secure, stable, and robust. It manages more than 6 million domains, and has over 300 registrars connected today.
The following describes a detailed plan for a robust and reliable SRS that meets all ICANN requirements including compliance with Specifications 6 and 10.

24.2 The Plan for Operation of a Robust and Reliable SRS

24.2.1 High-level SRS System Description

The SRS to be used for .hotels will leverage a production-proven, standards-based, highly reliable and high-performance domain name registration and management system that fully meets or exceeds the requirements as identified in the new gTLD Application Guidebook.

The SRS is the central component of any registry implementation and its quality, reliability and capabilities are essential to the overall stability of the TLD. Neustar has a documented history of deploying SRS implementations with proven and verifiable performance, reliability and availability. The SRS adheres to all industry standards and protocols. By leveraging an existing SRS platform, Booking.com is mitigating the significant risks and costs associated with the development of a new system. Highlights of the SRS include:

- State-of-the-art, production proven multi-layer design
- Ability to rapidly and easily scale from low to high volume as a TLD grows
- Fully redundant architecture at two sites
- Support for IDN registrations in compliance with all standards
- Use by over 300 Registrars
- EPP connectivity over IPv6
- Performance being measured using 100% of all production transactions (not sampling).

24.2.2 SRS Systems, Software, Hardware, and Interoperability

The systems and software that the registry operates on are a critical element to providing a high quality of service. If the systems are of poor quality, if they are difficult to maintain and operate, or if the registry personnel are unfamiliar with them, the registry will be prone to outages. Neustar has a decade of experience operating registry infrastructure to extremely high service level requirements. The infrastructure is designed using best of breed systems and software. Much of the application software that performs registry-specific operations was developed by the current engineering team and a result the team is intimately familiar with its operations.

The architecture is highly scalable and provides the same high level of availability and performance as volumes increase. It combines load balancing technology with scalable server technology to provide a cost effective and efficient method for scaling.

The Registry is able to limit the ability of any one registrar from adversely
impacting other registrars by consuming too many resources due to excessive EPP
transactions. The system uses network layer 2 level packet shaping to limit the
number of simultaneous connections registrars can open to the protocol layer.

All interaction with the Registry is recorded in log files. Log files are generated
at each layer of the system. These log files record at a minimum:

- The IP address of the client
- Timestamp
- Transaction Details
- Processing Time.

In addition to logging of each and every transaction with the SRS, Neustar maintains
audit records, in the database, of all transformational transactions. These audit
records allow the Registry, in support of the applicant, to produce a complete
history of changes for any domain name.

24.2.3 SRS Design

The SRS incorporates a multi-layer architecture that is designed to mitigate risks
and easily scale as volumes increase. The three layers of the SRS are:

- Protocol Layer
- Business Policy Layer
- Database.

Each of the layers is described below.

24.2.4 Protocol Layer

The first layer is the protocol layer, which includes the EPP interface to
registrars. It consists of a high availability farm of load-balanced EPP servers.
The servers are designed to be fast processors of transactions. The servers perform
basic validations and then feed information to the business policy engines as
described below. The protocol layer is horizontally scalable as dictated by volume.

The EPP servers authenticate against a series of security controls before granting
service, as follows:

- The registrar's host exchanges keys to initiates a TLS handshake session with the
EPP server.
- The registrar's host must provide credentials to determine proper access levels.
- The registrar's IP address must be preregistered in the network firewalls and
traffic-shapers.

24.2.5 Business Policy Layer

The Business Policy Layer is the "brain" of the registry system. Within this layer,
the policy engine servers perform rules-based processing as defined through
configurable attributes. This process takes individual transactions, applies various
validation and policy rules, persists data and dispatches notification through the
central database in order to publish to various external systems. External systems
fed by the Business Policy Layer include backend processes such as dynamic update of
DNS, WHOIS and Billing.

Similar to the EPP protocol farm, the SRS consists of a farm of application servers
within this layer. This design ensures that there is sufficient capacity to process
every transaction in a manner that meets or exceeds all service level requirements.
Some registries couple the business logic layer directly in the protocol layer or
within the database. This architecture limits the ability to scale the registry.
Using a decoupled architecture enables the load to be distributed among farms of
inexpensive servers that can be scaled up or down as demand changes.

The SRS today processes over 30 million EPP transactions daily.

24.2.6 Database

The database is the third core components of the SRS.   The primary function of the

SRS database is to provide highly reliable, persistent storage for all registry information required for domain registration services. The database is highly secure, with access limited to transactions from authenticated registrars, trusted application-server processes, and highly restricted access by the registry database administrators. A full description of the database can be found in response to Question 33.

Figure 24-1 depicts the overall SRS architecture including network components.

24.2.7 Number of Servers

As depicted in the SRS architecture diagram above Neustar operates a high availability architecture where at each level of the stack there are no single points of failures. Each of the network level devices run with dual pairs as do the databases.   For the .hotels registry, the SRS will operate with 8 protocol servers and 6 policy engine servers. These expand horizontally as volume increases due to additional TLDs, increased load, and through organic growth.   In addition to the SRS servers described above, there are multiple backend servers for services such as DNS and WHOIS. These are discussed in detail within those respective response sections.

24.2.8 Description of Interconnectivity with Other Registry Systems

The core SRS service interfaces with other external systems via Neustar's external systems layer. The services that the SRS interfaces with include:

- WHOIS
- DNS
- Billing
- Data Warehouse (Reporting and Data Escrow).

Other external interfaces may be deployed to meet the unique needs of a TLD. At this time there are no additional interfaces planned for .hotels.

The SRS includes an "external notifier" concept in its business policy engine as a message dispatcher.   This design allows time-consuming backend processing to be decoupled from critical online registrar transactions.   Using an external notifier solution, the registry can utilize "control levers" that allow it to tune or to disable processes to ensure optimal performance at all times.   For example, during the early minutes of a TLD launch, when unusually high volumes of transactions are expected, the registry can elect to suspend processing of one or more back end systems in order to ensure that greater processing power is available to handle the increased load requirements. This proven architecture has been used with numerous TLD launches, some of which have involved the processing of over tens of millions of transactions in the opening hours. The following are the standard three external notifiers used the SRS:

24.2.9 WHOIS External Notifier

The WHOIS external notifier dispatches a work item for any EPP transaction that may potentially have an impact on WHOIS. It is important to note that, while the WHOIS external notifier feeds the WHOIS system, it intentionally does not have visibility into the actual contents of the WHOIS system. The WHOIS external notifier serves just as a tool to send a signal to the WHOIS system that a change is ready to occur. The WHOIS system possesses the intelligence and data visibility to know exactly what needs to change in WHOIS. See response to Question 26 for greater detail.

24.2.10 DNS External Notifier

The DNS external notifier dispatches a work item for any EPP transaction that may potentially have an impact on DNS.   Like the WHOIS external notifier, the DNS external notifier does not have visibility into the actual contents of the DNS zones.   The work items that are generated by the notifier indicate to the dynamic DNS update sub-system that a change occurred that may impact DNS. That DNS system has the ability to decide what actual changes must be propagated out to the DNS constellation. See response to Question 35 for greater detail.

24.2.11 Billing External Notifier

The billing external notifier is responsible for sending all billable transactions to the downstream financial systems for billing and collection. This external notifier contains the necessary logic to determine what types of transactions are billable. The financial systems use this information to apply appropriate debits and credits based on registrar.

24.2.12 Data Warehouse

The data warehouse is responsible for managing reporting services, including registrar reports, business intelligence dashboards, and the processing of data escrow files. The Reporting Database is used to create both internal and external reports, primarily to support registrar billing and contractual reporting requirement. The data warehouse databases are updated on a daily basis with full copies of the production SRS data.

24.2.13 Frequency of Synchronization between Servers

The external notifiers discussed above perform updates in near real-time, well within the prescribed service level requirements. As transactions from registrars update the core SRS, update notifications are pushed to the external systems such as DNS and WHOIS. These updates are typically live in the external system within 2-3 minutes.

24.2.14 Synchronization Scheme (e.g., hot standby, cold standby)

Neustar operates two hot databases within the data center that is operating in primary mode. These two databases are kept in sync via synchronous replication. Additionally, there are two databases in the secondary data center. These databases are updated real time through asynchronous replication. This model allows for high performance while also ensuring protection of data. See response to Question 33 for greater detail.

24.2.15 Compliance with Specification 6 Section 1.2

The SRS implementation for .hotels is fully compliant with Specification 6, including section 1.2. EPP Standards are described and embodied in a number of IETF RFCs, ICANN contracts and practices, and registry-registrar agreements. Extensible Provisioning Protocol or EPP is defined by a core set of RFCs that standardize the interface that make up the registry-registrar model. The SRS interface supports EPP 1.0 as defined in the following RFCs shown in Table 24-1.

Additional information on the EPP implementation and compliance with RFCs can be found in the response to Question 25.

24.2.16 Compliance with Specification 10

Specification 10 of the New TLD Agreement defines the performance specifications of the TLD, including service level requirements related to DNS, RDDS (WHOIS), and EPP. The requirements include both availability and transaction response time measurements. As an experienced registry operator, Neustar has a long and verifiable track record of providing registry services that consistently exceed the performance specifications stipulated in ICANN agreements. This same high level of service will be provided for the .hotels Registry. The following section describes Neustar's experience and its capabilities to meet the requirements in the new agreement.

To properly measure the technical performance and progress of TLDs, Neustar collects data on key essential operating metrics. These measurements are key indicators of the performance and health of the registry. Neustar's current .biz SLA commitments are among the most stringent in the industry today, and exceed the requirements for new TLDs. Table 24-2 compares the current SRS performance levels compared to the requirements for new TLDs, and clearly demonstrates the ability of the SRS to exceed those requirements.

Their ability to commit and meet such high performance standards is a direct result of their philosophy towards operational excellence. See response to Question 31 for a full description of their philosophy for building and managing for performance.

24.3 Resourcing Plans

The development, customization, and on-going support of the SRS are the
responsibility of a combination of technical and operational teams, including:

- Development∕Engineering
- Database Administration
- Systems Administration
- Network Engineering.

Additionally, if customization or modifications are required, the Product Management
and Quality Assurance teams will be involved in the design and testing.   Finally,
the Network Operations and Information Security play an important role in ensuring
the systems involved are operating securely and reliably.

The necessary resources will be pulled from the pool of operational resources
described in detail in the response to Question 31. Neustar's SRS implementation is
very mature, and has been in production for over 10 years. As such, very little new
development related to the SRS will be required for the implementation of the
.hotels registry. The following resources are available from those teams:

Development∕Engineering – 19 employees
Database Administration- 10 employees
Systems Administration – 24 employees
Network Engineering – 5 employees

The resources are more than adequate to support the SRS needs of all the TLDs
operated by Neustar, including the .hotels registry.

25. Extensible Provisioning Protocol (EPP)

Response to Question 25: Extensible Provisioning Protocol

25.1 Introduction

Booking.com's back-end registry operator, Neustar, Inc, has over 10 years of
experience operating EPP based registries. They deployed one of the first EPP
registries in 2001 with the launch of .biz. In 2004, they were the first gTLD to
implement EPP 1.0. Over the last ten years Neustar has implemented numerous
extensions to meet various unique TLD requirements. Neustar will leverage its
extensive experience to ensure Booking.com is provided with an unparalleled EPP
based registry. The following discussion explains the EPP interface which will be
used for the .hotels registry. This interface exists within the protocol farm layer
as described in Question 24 and is depicted in Figure 25-1.

25.2 EPP Interface

Registrars are provided with two different interfaces for interacting with the
registry. Both are EPP based, and both contain all the functionality necessary to
provision and manage domain names. The primary mechanism is an EPP interface to
connect directly with the registry. This is the interface registrars will use for
most of their interactions with the registry.

However, an alternative web GUI (Registry Administration Tool) that can also be used
to perform EPP transactions will be provided. The primary use of the Registry
Administration Tool is for performing administrative or customer support tasks.
The main features of the EPP implementation are:

- Standards Compliance: The EPP XML interface is compliant to the EPP RFCs. As
future EPP RFCs are published or existing RFCs are updated, Neustar makes changes to
the implementation keeping in mind of any backward compatibility issues.
- Scalability: The system is deployed keeping in mind that it may be required to
grow and shrink the footprint of the Registry system for a particular TLD.
- Fault-tolerance: The EPP servers are deployed in two geographically separate data
centers to provide for quick failover capability in case of a major outage in a
particular data center. The EPP servers adhere to strict availability requirements
defined in the SLAs.

- Configurability: The EPP extensions are built in a way that they can be easily configured to turn on or off for a particular TLD.
- Extensibility: The software is built ground up using object oriented design. This allows for easy extensibility of the software without risking the possibility of the change rippling through the whole application.
- Auditable: The system stores detailed information about EPP transactions from provisioning to DNS and WHOIS publishing. In case of a dispute regarding a name registration,   the Registry can provide comprehensive audit information on EPP transactions.
- Security: The system provides IP address based access control, client credential-based authorization test, digital certificate exchange, and connection limiting to the protocol layer.

25.3 Compliance with RFCs and Specifications

The registry-registrar model is described and embodied in a number of IETF RFCs, ICANN contracts and practices, and registry-registrar agreements. As shown in Table 25-1, EPP is defined by the core set of RFCs that standardize the interface that registrars use to provision domains with the SRS.   As a core component of the SRS architecture, the implementation is fully compliant with all EPP RFCs.

Neustar ensures compliance with all RFCs through a variety of processes and procedures. Members from the engineering and standards teams actively monitor and participate in the development of RFCs that impact the registry services, including those related to EPP.   When new RFCs are introduced or existing ones are updated, the team performs a full compliance review of each system impacted by the change. Furthermore, all code releases include a full regression test that includes specific test cases to verify RFC compliance.

Neustar has a long history of providing exceptional service that exceeds all performance specifications. The SRS and EPP interface have been designed to exceed the EPP specifications defined in Specification 10 of the Registry Agreement and profiled in Table 25-2.   Evidence of Neustar's ability to perform at these levels can be found in the .biz monthly progress reports found on the ICANN website.

25.3.1 EPP Toolkits

Toolkits, under open source licensing, are freely provided to registrars for interfacing with the SRS. Both Java and C++ toolkits will be provided, along with the accompanying documentation. The Registrar Tool Kit (RTK) is a software development kit (SDK) that supports the development of a registrar software system for registering domain names in the registry using EPP. The SDK consists of software and documentation as described below.

The software consists of working Java and C++ EPP common APIs and samples that implement the EPP core functions and EPP extensions used to communicate between the registry and registrar. The RTK illustrates how XML requests (registration events) can be assembled and forwarded to the registry for processing. The software provides the registrar with the basis for a reference implementation that conforms to the EPP registry-registrar protocol. The software component of the SDK also includes XML schema definition files for all Registry EPP objects and EPP object extensions. The RTK also includes a "dummy" server to aid in the testing of EPP clients.

The accompanying documentation describes the EPP software package hierarchy, the object data model, and the defined objects and methods (including calling parameter lists and expected response behavior). New versions of the RTK are made available from time to time to provide support for additional features as they become available and support for other platforms and languages.

25.4 Proprietary EPP Extensions

The .hotels registry will not include proprietary EPP extensions. Neustar has implemented various EPP extensions for both internal and external use in other TLD registries.   These extensions use the standard EPP extension framework described in RFC 5730. Table 25-3 provides a list of extensions developed for other TLDs. Should the .hotels registry require an EPP extension at some point in the future, the extension will be implemented in compliance with all RFC specifications including RFC 3735.

The full EPP schema to be used in the .hotels registry is attached in the document titled "EPP Schema."

25.5 Resourcing Plans

The development and support of EPP is largely the responsibility of the Development∕ Engineering and Quality Assurance teams. As an experience registry operator with a fully developed EPP solution, on-going support is largely limited to periodic updates to the standard and the implementation of TLD specific extensions.

The necessary resources will be pulled from the pool of available resources described in detail in the response to Question 31. The following resources are available from those teams:

Development∕Engineering – 19 employees
Quality Assurance - 7 employees.

These resources are more than adequate to support any EPP modification needs of the .hotels registry.

26. Whois

Response to Question 26 – WHOIS

26.1 Introduction

Booking.com recognizes the importance of an accurate, reliable, and up-to-date WHOIS database to governments, law enforcement, intellectual property holders and the public as a whole and is firmly committed to complying with all of the applicable WHOIS specifications for data objects, bulk access, and lookups as defined in Specifications 4 and 10 to the Registry Agreement. Booking.com's back-end registry services provider, Neustar, Inc, has extensive experience providing ICANN and RFC-compliant WHOIS services for each of the TLDs that it operates both as a Registry Operator for gTLDs, ccTLDs and back-end registry services provider. As one of the first "thick" registry operators in the gTLD space, Neustar's WHOIS service has been designed from the ground up to display as much information as required by a TLD and respond to a very stringent availability and performance requirement.

Some of the key features of Neustar's solution that will be used in .hotels include:

- Fully compliant with all relevant RFCs including 3912
- Production proven, highly flexible, and scalable with a track record of 100% availability over the past 10 years
- Exceeds current and proposed performance specifications
- Supports dynamic updates with the capability of doing bulk updates
- Geographically distributed sites to provide greater stability and performance
- In addition, the .hotels thick-WHOIS solution also provides for additional search capabilities and mechanisms to mitigate potential forms of abuse as discussed below. (e.g., IDN, registrant data).

26.2 Software Components

The WHOIS architecture comprises the following components:

- An in-memory database local to each WHOIS node: To provide for the performance needs, the WHOIS data is served from an in-memory database indexed by searchable keys.
- Redundant servers: To provide for redundancy, the WHOIS updates are propagated to a cluster of WHOIS servers that maintain an independent copy of the database.
- Attack resistant: To ensure that the WHOIS system cannot be abused using malicious queries or DOS attacks, the WHOIS server is only allowed to query the local database and rate limits on queries based on IPs and IP ranges can be readily applied.
- Accuracy auditor: To ensure the accuracy of the information served by the WHOIS servers, a daily audit is done between the SRS information and the WHOIS responses for the domain names which are updated during the last 24-hour period. Any discrepancies are resolved proactively.

- Modular design: The WHOIS system allows for filtering and translation of data elements between the SRS and the WHOIS database to allow for customizations.
- Scalable architecture: The WHOIS system is scalable and has a very small footprint. Depending on the query volume, the deployment size can grow and shrink quickly.
- Flexible: It is flexible enough to accommodate thin, thick, or modified thick models and can accommodate any future ICANN policy, such as different information display levels based on user categorization.
- SRS master database: The SRS database is the main persistent store of the Registry information. The Update Agent computes what WHOIS updates need to be pushed out. A publish-subscribe mechanism then takes these incremental updates and pushes to all the WHOIS slaves that answer queries.

26.3 Compliance with RFC and Specifications 4 and 10

Neustar has been running thick-WHOIS Services for over 10+ years in full compliance with RFC 3912 and with Specifications 4 and 10 of the Registry Agreement.RFC 3912 is a simple text based protocol over TCP that describes the interaction between the server and client on port 43. Neustar built a home-grown solution for this service. It processes millions of WHOIS queries per day.

Table 26-1 describes Neustar's compliance with Specifications 4 and 10.

Neustar ensures compliance with all RFCs through a variety of processes and procedures. Members from the engineering and standards teams actively monitor and participate in the development of RFCs that impact the registry services, including those related to WHOIS.   When new RFCs are introduced or existing ones are updated, the team performs a full compliance review of each system impacted by the change. Furthermore, all code releases include a full regression test that includes specific test cases to verify RFC compliance.

26.4 High-level WHOIS System Description

26.4.1 WHOIS Service (port 43)

The WHOIS service is responsible for handling port 43 queries. Our WHOIS is optimized for speed using an in-memory database and master-slave architecture between the SRS and WHOIS slaves.

The WHOIS service also has built-in support for IDN. If the domain name being queried is an IDN, the returned results include the language of the domain name, the domain name's UTF-8 encoded representation along with the Unicode code page.

26.4.2 Web Page for WHOIS queries

In addition to the WHOIS Service on port 43, Neustar provides a web based WHOIS application (www.whois..hotels). It is an intuitive and easy to use application for the general public to use. WHOIS web application provides all of the features available in the port 43 WHOIS. This includes full and partial search on:

- Domain names
- Nameservers
- Registrant, Technical and Administrative Contacts
- Registrars

It also provides features not available on the port 43 service. These include:

1. Redemption Grace Period calculation: Based on the registry's policy, domains in pendingDelete can be restorable or scheduled for release depending on the date⁄time the domain went into pendingDelete. For these domains, the web based WHOIS displays "Restorable" or "Scheduled for Release" to clearly show this additional status to the user.
2. Extensive support for international domain names (IDN)
3. Ability to perform WHOIS lookups on the actual Unicode IDN
4. Display of the actual Unicode IDN in addition to the ACE-encoded name
5. A Unicode to Punycode and Punycode to Unicode translator
6. An extensive FAQ
7. A list of upcoming domain deletions

26.5 IT and Infrastructure Resources

As described above the WHOIS architecture uses a workflow that decouples the update
process from the SRS. This ensures SRS performance is not adversely affected by the
load requirements of dynamic updates. It is also decoupled from the WHOIS lookup
agent to ensure the WHOIS service is always available and performing well for
users. Each of Neustar's geographically diverse WHOIS sites use:

- Firewalls, to protect this sensitive data
- Dedicated servers for MQ Series, to ensure guaranteed delivery of WHOIS updates
- Packetshaper for source IP address-based bandwidth limiting
- Load balancers to distribute query load
- Multiple WHOIS servers for maximizing the performance of WHOIS service.

The WHOIS service uses HP BL 460C servers, each with 2 X Quad Core CPU and a 64GB of
RAM. The existing infrastructure has 6 servers, but is designed to be easily scaled
with additional servers should it be needed.
Figure 26-1 depicts the different components of the WHOIS architecture.

26.6 Interconnectivity with Other Registry System

As described in Question 24 about the SRS and further in response to Question 31,
"Technical Overview", when an update is made by a registrar that impacts WHOIS data,
a trigger is sent to the WHOIS system by the external notifier layer. The update
agent processes these updates, transforms the data if necessary and then uses
messaging oriented middleware to publish all updates to each WHOIS slave. The local
update agent accepts the update and applies it to the local in-memory database. A
separate auditor compares the data in WHOIS and the SRS daily and monthly to ensure
accuracy of the published data.

26.7 Frequency of Synchronization between Servers

Updates from the SRS, through the external notifiers, to the constellation of
independent WHOIS slaves happens in real-time via an asynchronous publish⁄subscribe
messaging architecture.   The updates are guaranteed to be updated in each slave
within the required SLA of 95% ≤ 60 minutes. Please note that Neustar's current
architecture is built towards the stricter SLAs (95% ≤ 15 minutes) of .BIZ. The
vast majority of updates tend to happen within 2-3 minutes.

26.8 Provision for Searchable WHOIS Capabilities

Neustar will create a new web-based service to address the new search features based
on requirements specified in Specification 4 Section 1.8. The application will
enable users to search the WHOIS directory using any one or more of the following
fields:

- Domain name
- Registrar ID
- Contacts and registrant's name
- Contact and registrant's postal address, including all the sub-fields described in
EPP (e.g., street, city, state or province, etc.)
- Name server name and name server IP address
- The system will also allow search using non-Latin character sets which are
compliant with IDNA specification.

The user will choose one or more search criteria, combine them by Boolean operators
(AND, OR, NOT) and provide partial or exact match regular expressions for each of
the criterion name-value pairs.   The domain names matching the search criteria will
be returned to the user.

Figure 26-2 shows an architectural depiction of the new service.

To mitigate the risk of this powerful search service being abused by unscrupulous
data miners, a layer of security will be built around the query engine which will
allow the registry to identify rogue activities and then take appropriate measures.
Potential abuses include, but are not limited to:

- Data Mining
- Unauthorized Access

- Excessive Querying
- Denial of Service Attacks

To mitigate the abuses noted above, Neustar will implement any or all of these
mechanisms as appropriate:

- Username-password based authentication
- Certificate based authentication
- Data encryption
- CAPTCHA mechanism to prevent robo invocation of Web query
- Fee-based advanced query capabilities for premium customers.

The searchable WHOIS application will adhere to all privacy laws and policies of the
.hotels registry.

26.9 Resourcing Plans

As with the SRS, the development, customization, and on-going support of the WHOIS
service is the responsibility of a combination of technical and operational teams.
The primary groups responsible for managing the service include:

- Development∕Engineering – 19 employees
- Database Administration – 10 employees
- Systems Administration – 24 employees
- Network Engineering – 5 employees

Additionally, if customization or modifications are required, the Product Management
and Quality Assurance teams will also be involved. Finally, the Network Operations
and Information Security play an important role in ensuring the systems involved are
operating securely and reliably. The necessary resources will be pulled from the
pool of available resources described in detail in the response to Question 31.
Neustar's WHOIS implementation is very mature, and has been in production for over
10 years. As such, very little new development will be required to support the
implementation of the .hotels registry. The resources are more than adequate to
support the WHOIS needs of all the TLDs operated by Neustar, including the .hotels
registry.

27. Registration Life Cycle

Response to Question 27- Registration Life Cycle

27.1 Registration Life Cycle

27.1.1 Introduction

.hotels will follow the lifecycle and business rules found in the majority of gTLDs
today. Booking.com's selected back-end operator for .hotels, Neustar, Inc, has over
ten years of experience managing numerous TLDs that utilize standard and unique
business rules and lifecycles. This section describes the business rules,
registration states, and the overall domain lifecycle that will be use for .hotels.

27.1.2 Domain Lifecycle - Description

The registry will use the EPP 1.0 standard for provisioning domain names, contacts
and hosts. Each domain record is comprised of three registry object types: domain,
contacts, and hosts.

Domains, contacts and hosts may be assigned various EPP defined statuses indicating
either a particular state or restriction placed on the object. Some statuses may be
applied by the Registrar; other statuses may only be applied by the Registry.
Statuses are an integral part of the domain lifecycle and serve the dual purpose of
indicating the particular state of the domain and indicating any restrictions placed
on the domain. The EPP standard defines 17 statuses, however only 14 of these
statuses will be used in the .hotels registry per the defined .hotels business rules.

The following is a brief description of each of the statuses. Server statuses may

only be applied by the Registry, and client statuses may be applied by the Registrar.

- OK – Default status applied by the Registry.
- Inactive – Default status applied by the Registry if the domain has less than 2 nameservers.
- PendingCreate – Status applied by the Registry upon processing a successful Create command, and indicates further action is pending. This status will not be used in the .hotels registry.
- PendingTransfer – Status applied by the Registry upon processing a successful Transfer request command, and indicates further action is pending.
- PendingDelete – Status applied by the Registry upon processing a successful Delete command that does not result in the immediate deletion of the domain, and indicates further action is pending.
- PendingRenew – Status applied by the Registry upon processing a successful Renew command that does not result in the immediate renewal of the domain, and indicates further action is pending. This status will not be used in the .hotels registry.
- PendingUpdate – Status applied by the Registry if an additional action is expected to complete the update, and indicates further action is pending. This status will not be used in the .hotels registry.
- Hold – Removes the domain from the DNS zone.
- UpdateProhibted – Prevents the object from being modified by an Update command.
- TransferProhibted – Prevents the object from being transferred to another Registrar by the Transfer command.
- RenewProhibted – Prevents a domain from being renewed by a Renew command.
- DeleteProhibted – Prevents the object from being deleted by a Delete command.

The lifecycle of a domain begins with the registration of the domain. All registrations must follow the EPP standard, as well as the specific business rules described in the response to Question 18 above. Upon registration a domain will either be in an active or inactive state. Domains in an active state are delegated and have their delegation information published to the zone. Inactive domains either have no delegation information or their delegation information in not published in the zone. Following the initial registration of a domain, one of five actions may occur during its lifecycle:

- Domain may be updated
- Domain may be deleted, either within or after the add-grace period
- Domain may be renewed at anytime during the term
- Domain may be auto-renewed by the Registry
- Domain may be transferred to another registrar.

Each of these actions may result in a change in domain state. This is described in more detail in the following section. Every domain must eventually be renewed, auto-renewed, transferred, or deleted.   A registrar may apply EPP statuses described above to prevent specific actions such as updates, renewals, transfers, or deletions.

27.2 Registration States

27.2.1 Domain Lifecycle – Registration States

As described above the .hotels registry will implement a standard domain lifecycle found in most gTLD registries today. There are five possible domain states:

- Active
- Inactive
- Locked
- Pending Transfer
- Pending Delete.

All domains are always in either an Active or Inactive state, and throughout the course of the lifecycle may also be in a Locked, Pending Transfer, and Pending Delete state. Specific conditions such as applied EPP policies and registry business rules will determine whether a domain can be transitioned between states. Additionally, within each state, domains may be subject to various timed events such as grace periods, and notification periods.

27.2.2 Active State

The active state is the normal state of a domain and indicates that delegation data has been provided and the delegation information is published in the zone. A domain in an Active state may also be in the Locked or Pending Transfer states.

27.2.3 Inactive State

The Inactive state indicates that a domain has not been delegated or that the delegation data has not been published to the zone. A domain in an Inactive state may also be in the Locked or Pending Transfer states. By default all domain in the Pending Delete state are also in the Inactive state.

27.2.4 Locked State

The Locked state indicates that certain specified EPP transactions may not be performed to the domain. A domain is considered to be in a Locked state if at least one restriction has been placed on the domain; however up to eight restrictions may be applied simultaneously. Domains in the Locked state will also be in the Active or Inactive, and under certain conditions may also be in the Pending Transfer or Pending Delete states.

27.2.5 Pending Transfer State

The Pending Transfer state indicates a condition in which there has been a request to transfer the domain from one registrar to another. The domain is placed in the Pending Transfer state for a period of time to allow the current (losing) registrar to approve (ack) or reject (nack) the transfer request. Registrars may only nack requests for reasons specified in the Inter-Registrar Transfer Policy.

27.2.6 Pending Delete State

The Pending Delete State occurs when a Delete command has been sent to the Registry after the first 5 days (120 hours) of registration. The Pending Delete period is 35-days during which the first 30-days the name enters the Redemption Grace Period (RGP) and the last 5-days guarantee that the domain will be purged from the Registry Database and available to public pool for registration on a first come, first serve basis.

27.3 Typical Registration Lifecycle Activities

27.3.1 Domain Creation Process

The creation (registration) of domain names is the fundamental registry operation. All other operations are designed to support or compliment a domain creation. The following steps occur when a domain is created.

1. Contact objects are created in the SRS database.   The same contact object may be used for each contact type, or they may all be different. If the contacts already exist in the database this step may be skipped.
2. Nameservers are created in the SRS database.   Nameservers are not required to complete the registration process; however any domain with less than 2 name servers will not be resolvable.
3. The domain is created using the each of the objects created in the previous steps. In addition, the term and any client statuses may be assigned at the time of creation.

The actual number of EPP transactions needed to complete the registration of a domain name can be as few as one and as many as 40. The latter assumes seven distinct contacts and 13 nameservers, with Check and Create commands submitted for each object.

27.3.2 Update Process

Registry objects may be updated (modified) using the EPP Modify operation. The Update transaction updates the attributes of the object.

For example, the Update operation on a domain name will only allow the following attributes to be updated:

- Domain statuses

- Registrant ID
- Administrative Contact ID
- Billing Contact ID
- Technical Contact ID
- Nameservers
- AuthInfo
- Additional Registrar provided fields.

The Update operation will not modify the details of the contacts. Rather it may be used to associate a different contact object (using the Contact ID) to the domain name. To update the details of the contact object the Update transaction must be applied to the contact itself. For example, if an existing registrant wished to update the postal address, the Registrar would use the Update command to modify the contact object, and not the domain object.

27.3.4 Renew Process

The term of a domain may be extended using the EPP Renew operation. ICANN policy general establishes the maximum term of a domain name to be 10 years, and Neustar recommends not deviating from this policy. A domain may be renewed⁄extended at any point time, even immediately following the initial registration. The only stipulation is that the overall term of the domain name may not exceed 10 years. If a Renew operation is performed with a term value will extend the domain beyond the 10 year limit, the Registry will reject the transaction entirely.

27.3.5 Transfer Process

The EPP Transfer command is used for several domain transfer related operations:

- Initiate a domain transfer
- Cancel a domain transfer
- Approve a domain transfer
- Reject a domain transfer.

To transfer a domain from one Registrar to another the following process is followed:

1. The gaining (new) Registrar submits a Transfer command, which includes the AuthInfo code of the domain name.
2. If the AuthInfo code is valid and the domain is not in a status that does not allow transfers the domain is placed into pendingTransfer status
3. A poll message notifying the losing Registrar of the pending transfer is sent to the Registrar's message queue
4. The domain remains in pendingTransfer status for up to 120 hours, or until the losing (current) Registrar Acks (approves) or Nack (rejects) the transfer request
5. If the losing Registrar has not Acked or Nacked the transfer request within the 120 hour timeframe, the Registry auto-approves the transfer
6. The requesting Registrar may cancel the original request up until the transfer has been completed.

A transfer adds an additional year to the term of the domain. In the event that a transfer will cause the domain to exceed the 10 year maximum term, the Registry will add a partial term up to the 10 year limit.   Unlike with the Renew operation, the Registry will not reject a transfer operation.

27.3.6 Deletion Process

A domain may be deleted from the SRS using the EPP Delete operation.   The Delete operation will result in either the domain being immediately removed from the database or the domain being placed in pendingDelete status.   The outcome is dependent on when the domain is deleted. If the domain is deleted within the first five days (120 hours) of registration, the domain is immediately removed from the database. A deletion at any other time will result in the domain being placed in pendingDelete status and entering the Redemption Grace Period (RGP).   Additionally, domains that are deleted within five days (120) hours of any billable (add, renew, transfer) transaction may be deleted for credit.

27.4 Applicable Time Elements

The following section explains the time elements that are involved.

27.4.1 Grace Periods

There are six grace periods:

- Add-Delete Grace Period (AGP)
- Renew-Delete Grace Period
- Transfer-Delete Grace Period
- Auto-Renew-Delete Grace Period
- Auto-Renew Grace Period
- Redemption Grace Period (RGP).

The first four grace periods listed above are designed to provide the Registrar with
the ability to cancel a revenue transaction (add, renew, or transfer) within a
certain period of time and receive a credit for the original transaction.
The following describes each of these grace periods in detail.

27.4.2 Add-Delete Grace Period

The APG is associated with the date the Domain was registered. Domains may be
deleted for credit during the initial 120 hours of a registration, and the Registrar
will receive a billing credit for the original registration. If the domain is
deleted during the Add Grace Period, the domain is dropped from the database
immediately and a credit is applied to the Registrar's billing account.

27.4.3 Renew-Delete Grace Period

The Renew-Delete Grace Period is associated with the date the Domain was renewed.
Domains may be deleted for credit during the 120 hours after a renewal. The grace
period is intended to allow Registrars to correct domains that were mistakenly
renewed. It should be noted that domains that are deleted during the renew grace
period will be placed into pendingDelete and will enter the RGP (see below).

27.4.4 Transfer-Delete Grace Period

The Transfer-Delete Grace Period is associated with the date the Domain was
transferred to another Registrar. Domains may be deleted for credit during the 120
hours after a transfer. It should be noted that domains that are deleted during the
renew grace period will be placed into pendingDelete and will enter the RGP.   A
deletion of domain after a transfer is not the method used to correct a transfer
mistake. Domains that have been erroneously transferred or hijacked by another
party can be transferred back to the original registrar through various means
including contacting the Registry.

27.4.5 Auto-Renew-Delete Grace Period

The Auto-Renew-Delete Grace Period is associated with the date the Domain was
auto-renewed. Domains may be deleted for credit during the 120 hours after an
auto-renewal. The grace period is intended to allow Registrars to correct domains
that were mistakenly auto-renewed. It should be noted that domains that are deleted
during the auto-renew delete grace period will be placed into pendingDelete and will
enter the RGP.

27.4.6 Auto-Renew Grace Period

The Auto-Renew Grace Period is a special grace period intended to provide
registrants with an extra amount of time, beyond the expiration date, to renew their
domain name.   The grace period lasts for 45 days from the expiration date of the
domain name. Registrars are not required to provide registrants with the full 45
days of the period.

27.4.7 Redemption Grace Period

The RGP is a special grace period that enables Registrars to restore domains that
have been inadvertently deleted but are still in pendingDelete status within the
Redemption Grace Period. All domains enter the RGP except those deleted during the
AGP.

The RGP period is 30 days, during which time the domain may be restored using the

EPP RenewDomain command as described below. Following the 30day RGP period the domain will remain in pendingDelete status for an additional five days, during which time the domain may NOT be restored. The domain is released from the SRS, at the end of the 5 day non-restore period. A restore fee applies and is detailed in the Billing Section. A renewal fee will be automatically applied for any domain past expiration.

Neustar has created a unique restoration process that uses the EPP Renew transaction to restore the domain and fulfill all the reporting obligations required under ICANN policy. The following describes the restoration process.

27.5 State Diagram

Figure 27-1 provides a description of the registration lifecycle.

The different states of the lifecycle are active, inactive, locked, pending transfer, and pending delete. Please refer to section 27.1.1 for detail description of each of these states. The lines between the states represent triggers that transition a domain from one state to another.

The details of each trigger are described below:

- Create: Registry receives a create domain EPP command.
- WithNS: The domain has met the minimum number of nameservers required by registry policy in order to be published in the DNS zone.
- WithOutNS: The domain has not met the minimum number of nameservers required by registry policy. The domain will not be in the DNS zone.
- Remove Nameservers: Domain's nameserver(s) is removed as part of an update domain EPP command. The total nameserver is below the minimum number of nameservers required by registry policy in order to be published in the DNS zone.
- Add Nameservers: Nameserver(s) has been added to domain as part of an update domain EPP command. The total number of nameservers has met the minimum number of nameservers required by registry policy in order to be published in the DNS zone.
- Delete: Registry receives a delete domain EPP command.
- DeleteAfterGrace: Domain deletion does not fall within the add grace period.
- DeleteWithinAddGrace: Domain deletion falls within add grace period.
- Restore: Domain is restored. Domain goes back to its original state prior to the delete command.
- Transfer: Transfer request EPP command is received.
- Transfer Approve∕Cancel∕Reject: Transfer requested is approved or cancel or rejected.
- TransferProhibited: The domain is in clientTransferProhibited and∕or serverTranferProhibited status. This will cause the transfer request to fail. The domain goes back to its original state.
- DeleteProhibited: The domain is in clientDeleteProhibited and∕or serverDeleteProhibited status. This will cause the delete command to fail. The domain goes back to its original state.

Note: the locked state is not represented as a distinct state on the diagram as a domain may be in a locked state in combination with any of the other states: inactive, active, pending transfer, or pending delete.

27.5.1 EPP RFC Consistency

As described above, the domain lifecycle is determined by ICANN policy and the EPP RFCs. Neustar has been operating ICANN TLDs for the past 10 years consistent and compliant with all the ICANN policies and related EPP RFCs.

27.6 Resources

The registration lifecycle and associated business rules are largely determined by policy and business requirements; as such the Product Management and Policy teams will play a critical role in working Applicant to determine the precise rules that meet the requirements of the TLD. Implementation of the lifecycle rules will be the responsibility of Development∕Engineering team, with testing performed by the Quality Assurance team.   Neustar's SRS implementation is very flexible and configurable, and in many case development is not required to support business rule changes.

The .hotels registry will be using standard lifecycle rules, and as such no customization is anticipated. However should modifications be required in the future, the necessary resources will be pulled from the pool of available resources described in detail in the response to Question 31. The following resources are available from those teams:

Development∕Engineering – 19 employees
Registry Product Management – 4 employees

These resources are more than adequate to support the development needs of all the TLDs operated by Neustar, including the .hotels registry.

28. Abuse Prevention and Mitigation

Response to Question 28 - Abuse Prevention and Mitigation

28.1 Abuse Prevention and Mitigation

Strong abuse prevention of a new gTLD is an important benefit to the internet community. Booking.com and its registry operator and back-end registry services provider, Neustar, Inc, agree that a registry must not only aim for the highest standards of technical and operational competence, but also needs to act as a steward of the space on behalf of the Internet community and ICANN in promoting the public interest.   Neustar brings extensive experience establishing and implementing registration policies. This experience will be leveraged to help .hotels combat abusive and malicious domain activity within the new gTLD space.

One of those public interest functions for a responsible domain name registry includes working towards the eradication of abusive domain name registrations, including, but not limited to, those resulting from:

- Illegal or fraudulent actions
- Spam
- Phishing
- Pharming
- Distribution of malware
- Fast flux hosting
- Botnets
- Distribution of child pornography
- Online sale or distribution of illegal pharmaceuticals.

More specifically, although traditionally botnets have used Internet Relay Chat (IRC) servers to control registry and the compromised PCs, or bots, for DDoS attacks and the theft of personal information, an increasingly popular technique, known as fast-flux DNS, allows botnets to use a multitude of servers to hide a key host or to create a highly-available control network. This ability to shift the attacker's infrastructure over a multitude of servers in various countries creates an obstacle for law enforcement and security researchers to mitigate the effects of these botnets. But a point of weakness in this scheme is its dependence on DNS for its translation services. By taking an active role in researching and monitoring these sorts of botnets, Booking.com's partner, Neustar, has developed the ability to efficiently work with various law enforcement and security communities to begin a new phase of mitigation of these types of threats.

28.1.1 Policies and Procedures to Minimize Abusive Registrations

A Registry must have the policies, resources, personnel, and expertise in place to combat such abusive DNS practices. As Booking.com's registry provider, Neustar is at the forefront of the prevention of such abusive practices and is one of the few currently existing registry operators to have actually developed and implemented an active "domain takedown" policy. Neustar also believes that a strong program is essential given that registrants have a reasonable expectation that they are in control of the data associated with their domains, especially its presence in the DNS zone. Because domain names are sometimes used as a mechanism to enable various illegitimate activities on the Internet often the best preventative measure to thwart these attacks is to remove the names completely from the DNS before they can

impart harm, not only to the domain name registrant, but also to millions of
unsuspecting Internet users.

Removing the domain name from the zone has the effect of shutting down all activity
associated with the domain name, including the use of all websites and e-mail. The
use of this technique should not be entered into lightly. Booking.com, through its
registry provider Neustar, has an extensive, defined, and documented process for
taking the necessary action of removing a domain from the zone when its presence in
the zone poses a threat to the security and stability of the infrastructure of the
Internet or the .hotels registry.

28.1.2 Abuse Point of Contact

As required by the Registry Agreement, .hotels will establish and publish on its
website a single abuse point of contact responsible for addressing inquiries from
law enforcement and the public related to malicious and abusive conduct. .hotels
will also provide such information to ICANN prior to the delegation of any domain
names in the TLD. This information shall consist of, at a minimum, a valid e-mail
address dedicated solely to the handling of malicious conduct complaints, and a
telephone number and mailing address for the primary contact. We will ensure that
this information will be kept accurate and up to date and will be provided to ICANN
if and when changes are made. In addition, with respect to inquiries from ICANN-
Accredited registrars, our registry services provider, Neustar, shall have an
additional point of contact, as it does today, handling requests by registrars
related to abusive domain name practices.

28.2 Policies Regarding Abuse Complaints

One of the key policies each new gTLD registry will need to have is an Acceptable
Use Policy that clearly delineates the types of activities that constitute "abuse"
and the repercussions associated with an abusive domain name registration. In
addition, the policy will be incorporated into the applicable Registry-Registrar
Agreement and reserve the right for the registry to take the appropriate actions
based on the type of abuse. This will include locking down the domain name
preventing any changes to the contact and nameserver information associated with the
domain name, placing the domain name "on hold" rendering the domain name
non-resolvable, transferring to the domain name to another registrar, and⁄or in
cases in which the domain name is associated with an existing law enforcement
investigation, substituting name servers to collect information about the DNS
queries to assist the investigation.

.hotels will adopt an Acceptable Use Policy that clearly defines the types of
activities that will not be permitted in the TLD and reserves the right of the
Applicant to lock, cancel, transfer or otherwise suspend or take down domain names
violating the Acceptable Use Policy and allow the Registry where and when
appropriate to share information with law enforcement. Each ICANN-Accredited
Registrar must agree to pass through the Acceptable Use Policy to its Resellers (if
applicable) and ultimately to the TLD registrants. Below is the Registry's initial
Acceptable Use Policy that we will use in connection with the .hotels.

28.2.1 .hotels Acceptable Use Policy

This Acceptable Use Policy gives the Registry the ability to quickly lock, cancel,
transfer or take ownership of any .hotels domain name, either temporarily or
permanently, if the domain name is being used in a manner that appears to threaten
the stability, integrity or security of the Registry, or any of its registrar
partners – and⁄or that may put the safety and security of any registrant or user at
risk. The process also allows the Registry to take preventive measures to avoid any
such criminal or security threats.

The Acceptable Use Policy may be triggered through a variety of channels, including,
among other things: private complaint, public alert, government or enforcement
agency outreach, and the on-going monitoring by the Registry or its partners. In all
cases, the Registry or its designees will alert Registry's registrar partners about
any identified threats, and will work closely with them to bring offending sites
into compliance.

The following are some (but not all) activities that may be subject to rapid domain
compliance:

- Phishing: the attempt to acquire personally identifiable information by masquerading as a website other than .hotels's own.
- Pharming: the redirection of Internet users to websites other than those the user intends to visit, usually through unauthorized changes to the Hosts file on a victim's computer or DNS records in DNS servers.
- Dissemination of Malware: the intentional creation and distribution of "malicious" software designed to infiltrate a computer system without the owner's consent, including, without limitation, computer viruses, worms, key loggers, and Trojans.
- Fast Flux Hosting: a technique used to shelter Phishing, Pharming and Malware sites and networks from detection and to frustrate methods employed to defend against such practices, whereby the IP address associated with fraudulent websites are changed rapidly so as to make the true location of the sites difficult to find.
- Botnetting: the development and use of a command, agent, motor, service, or software which is implemented: (1) to remotely control the computer or computer system of an Internet user without their knowledge or consent, (2) to generate direct denial of service (DDOS) attacks.
- Malicious Hacking: the attempt to gain unauthorized access (or exceed the level of authorized access) to a computer, information system, user account or profile, database, or security system.
- Child Pornography: the storage, publication, display and∕or dissemination of pornographic materials depicting individuals under the age of majority in the relevant jurisdiction.

The Registry reserves the right, in its sole discretion, to take any administrative and operational actions necessary, including the use of computer forensics and information security technological services, among other things, in order to implement the Acceptable Use Policy. In addition, the Registry reserves the right to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status, that it deems necessary, in its discretion; (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of Registry as well as its affiliates, subsidiaries, officers, directors, and employees; (4) per the terms of the registration agreement or (5) to correct mistakes made by the Registry or any Registrar in connection with a domain name registration. Registry also reserves the right to place upon registry lock, hold or similar status a domain name during resolution of a dispute.

28.2.2 Taking Action Against Abusive and∕or Malicious Activity

The Registry is committed to ensuring that those domain names associated with abuse or malicious conduct in violation of the Acceptable Use Policy are dealt with in a timely and decisive manner. These include taking action against those domain names that are being used to threaten the stability and security of the TLD, or is part of a real-time investigation by law enforcement.

Once a complaint is received from a trusted source, third-party, or detected by the Registry, the Registry will use commercially reasonable efforts to verify the information in the complaint. If that information can be verified to the best of the ability of the Registry, the sponsoring registrar will be notified and be given 12 hours to investigate the activity and either take down the domain name by placing the domain name on hold or by deleting the domain name in its entirety or providing a compelling argument to the Registry to keep the name in the zone. If the registrar has not taken the requested action after the 12-hour period (i.e., is unresponsive to the request or refuses to take action), the Registry will place the domain on "ServerHold". Although this action removes the domain name from the TLD zone, the domain name record still appears in the TLD WHOIS database so that the name and entities can be investigated by law enforcement should they desire to get involved.

28.2.2.1 Coordination with Law Enforcement

With the assistance of Neustar as its back-end registry services provider, Booking.com can meet its obligations under Section 2.8 of the Registry Agreement where required to take reasonable steps to investigate and respond to reports from law enforcement and governmental and quasi-governmental agencies of illegal conduct in connection with the use of its .hotels TLD. The Registry will respond to legitimate law enforcement inquiries within one business day from receiving the

request. Such response shall include, at a minimum, an acknowledgement of receipt
of the request, Questions or comments concerning the request, and an outline of the
next steps to be taken by Booking.com for rapid resolution of the request.

In the event such request involves any of the activities which can be validated by
the Registry and involves the type of activity set forth in the Acceptable Use
Policy, the sponsoring registrar is then given 12 hours to investigate the activity
further and either take down the domain name by placing the domain name on hold or
by deleting the domain name in its entirety or providing a compelling argument to
the registry to keep the name in the zone. If the registrar has not taken the
requested action after the 12-hour period (i.e., is unresponsive to the request or
refuses to take action), the Registry will place the domain on "serverHold".

28.3 Measures for Removal of Orphan Glue Records

As the Security and Stability Advisory Committee of ICANN (SSAC) rightly
acknowledges, although orphaned glue records may be used for abusive or malicious
purposes, the "dominant use of orphaned glue supports the correct and ordinary
operation of the DNS." See http:⁄⁄www.icann.org⁄en⁄committees⁄security⁄sac048.pdf.

While orphan glue often support correct and ordinary operation of the DNS, we
understand that such glue records can be used maliciously to point to name servers
that host domains used in illegal phishing, bot-nets, malware, and other abusive
behaviors. Problems occur when the parent domain of the glue record is deleted but
its children glue records still remain in DNS.   Therefore, when the Registry has
written evidence of actual abuse of orphaned glue, the Registry will take action to
remove those records from the zone to mitigate such malicious conduct.

Neustar run a daily audit of entries in its DNS systems and compares those with its
provisioning system. This serves as an umbrella protection to make sure that items
in the DNS zone are valid. Any DNS record that shows up in the DNS zone but not in
the provisioning system will be flagged for investigation and removed if necessary.
This daily DNS audit serves to not only prevent orphaned hosts but also other
records that should not be in the zone.

In addition, if either Booking.com or Neustar become aware of actual abuse on
orphaned glue after receiving written notification by a third party through its
Abuse Contact or through its customer support, such glue records will be removed
from the zone.

28.4 Resourcing Plans

Responsibility for abuse mitigation rests with a variety of functional groups. The
Abuse Monitoring team is primarily responsible for providing analysis and conducting
investigations of reports of abuse. The customer service team also plays an
important role in assisting with the investigations, responded to customers, and
notifying registrars of abusive domains. Finally, the Policy⁄Legal team is
responsible for developing the relevant policies and procedures.

The necessary resources will be pulled from the pool of available resources
described in detail in the response to Question 31. The following resources are
available from those teams:

Customer Support – 12 employees
Policy⁄Legal – 2 employees

The resources are more than adequate to support the abuse mitigation procedures of
the .hotels registry.

29. Rights Protection Mechanisms

Response to Question 29 - Rights Protection Mechanisms

29.1. Rights Protection Mechanisms

Booking.com is firmly committed to the protection of Intellectual Property rights

and to implementing the mandatory rights protection mechanisms contained in the Applicant Guidebook and detailed in Specification 7 of the Registry Agreement for .hotels. Booking.com recognizes that although the New gTLD program includes significant protections beyond those that were mandatory for a number of the current TLDs, a key motivator for Booking.com's selection of Neustar, Inc, as its registry services provider is Neustar's experience in successfully launching a number of TLDs with diverse rights protection mechanisms, including many the ones required in the Applicant Guidebook. More specifically, Booking.com will implement the following rights protection mechanisms in accordance with the Applicant Guidebook for .hotels as further described below:

- Trademark Clearinghouse: a one-stop shop so that trademark holders can protect their trademarks with a single registration.
- Sunrise and Trademark Claims processes for the TLD.
- Implementation of the Uniform Dispute Resolution Policy to address domain names that have been registered and used in bad faith in the TLD.
- Uniform Rapid Suspension: A quicker, more efficient and cheaper alternative to the Uniform Dispute Resolution Policy to deal with clear cut cases of cybersquatting.
- Implementation of a Thick WHOIS making it easier for rights holders to identify and locate infringing parties

29.1.1 Trademark Clearinghouse Including Sunrise and Trademark Claims

The first mandatory rights protection mechanism ("RPM") required to be implemented by each new gTLD Registry is support for, and interaction with, the trademark clearinghouse. The trademark clearinghouse is intended to serve as a central repository for information to be authenticated, stored and disseminated pertaining to the rights of trademark holders. The data maintained in the clearinghouse will support and facilitate other RPMs, including the mandatory Sunrise Period and Trademark Claims service. Although many of the details of how the trademark clearinghouse will interact with each registry operator and registrars, Booking.com is actively monitoring the developments of the Implementation Assistance Group ("IAG") designed to assist ICANN staff in firming up the rules and procedures associated with the policies and technical requirements for the trademark clearinghouse. In addition, Booking.com's back-end registry services provider is actively participating in the IAG to ensure that the protections afforded by the clearinghouse and associated RPMs are feasible and implementable for .hotels.

Utilizing the trademark clearinghouse, all operators of new gTLDs must offer: (i) a sunrise registration service for at least 30 days during the pre-launch phase giving eligible trademark owners an early opportunity to register second-level domains in new gTLDs; and (ii) a trademark claims service for at least the first 60 days that second-level registrations are open. The trademark claim service is intended to provide clear notice" to a potential registrant of the rights of a trademark owner whose trademark is registered in the clearinghouse.

Booking.com's registry service provider, Neustar, has already implemented Sunrise and∕or Trademark Claims programs for numerous TLDs including .biz, .us, .travel, .tel and .co and will implement the both of these services on behalf of .hotels.

29.1.1.1 Neustar's Experience in Implementing Sunrise and Trademark Claims Processes

In early 2002, Neustar became the first registry operator to launch a successful authenticated Sunrise process. This process permitted qualified trademark owners to pre-register their trademarks as domain names in the .us TLD space prior to the opening of the space to the general public. Unlike any other "Sunrise" plans implemented (or proposed before that time), Neustar validated the authenticity of Trademark applications and registrations with the United States Patent and Trademark Office (USPTO).

Subsequently, as the back-end registry operator for the .tel gTLD and the .co ccTLD, Neustar launched validated Sunrise programs employing processes. These programs are very similar to those that are to be employed by the Trademark Clearinghouse for new gTLDs.

Below is a high level overview of the implementation of the .co Sunrise period that demonstrates Neustar's experience and ability to provide a Sunrise service and an overview of Neustar's experience in implementing a Trademark Claims program to trademark owners for the launch of .BIZ. Neustar's experience in each of these

rights protection mechanisms will enable it to seamlessly provide these services on behalf of .hotels as required by ICANN.

a)   Sunrise and .co

The Sunrise process for .co was divided into two sub-phases:

- Local Sunrise giving holders of eligible trademarks that have obtained registered status from the Colombian trademark office the opportunity apply for the .CO domain names corresponding with their marks
- Global Sunrise program giving holders of eligible registered trademarks of national effect, that have obtained a registered status in any country of the world the opportunity apply for the .CO domain names corresponding with their marks for a period of time before registration is open to the public at large.

Like the new gTLD process set forth in the Applicant Guidebook, trademark owners had to have their rights validated by a Clearinghouse provider prior to the registration being accepted by the Registry. The Clearinghouse used a defined process for checking the eligibility of the legal rights claimed as the basis of each Sunrise application using official national trademark databases and submitted documentary evidence.

Applicants and∕or their designated agents had the option of interacting directly with the Clearinghouse to ensure their applications were accurate and complete prior to submitting them to the Registry pursuant to an optional "Pre-validation Process". Whether or not an applicant was "pre-validated", the applicant had to submit its corresponding domain name application through an accredited registrar. When the Applicant was pre-validated through the Clearinghouse, each was given an associated approval number that it had to supply the registry. If they were not pre-validated, applicants were required to submit the required trademark information through their registrar to the Registry.

As the registry level, Neustar, subsequently either delivered the:

- Approval number and domain name registration information to the Clearinghouse
- When there was no approval number, trademark information and the domain name registration information was provided to the Clearinghouse through EPP (as is currently required under the Applicant Guidebook).

Information was then used by the Clearinghouse as either further validation of those pre-validated applications, or initial validation of those that did not go through pre-validation. If the applicant was validated and their trademark matched the domain name applied-for, the Clearinghouse communicated that fact to the Registry via EPP.

When there was only one validated sunrise application, the application proceeded to registration when the .co launched. If there were multiple validated applications (recognizing that there could be multiple trademark owners sharing the same trademark), those were included in the .co Sunrise auction process. Neustar tracked all of the information it received and the status of each application and posted that status on a secure Website to enable trademark owners to view the status of its Sunrise application.

Although the exact process for the Sunrise program and its interaction between the trademark owner, Registry, Registrar, and IP Clearinghouse is not completely defined in the Applicant Guidebook and is dependent on the current RFI issued by ICANN in its selection of a Trademark Clearinghouse provider, Neustar's expertise in launching multiple Sunrise processes and its established software will implement a smooth and compliant Sunrise process for the new gTLDs.

b)   Trademark Claims Service Experience

With Neustar's .biz TLD launched in 2001, Neustar became the first TLD with a Trademark Claims service.   Neustar developed the Trademark Claim Service by enabling companies to stake claims to domain names prior to the commencement of live .biz domain registrations.

During the Trademark Claim process, Neustar received over 80,000 Trademark Claims from entities around the world. Recognizing that multiple intellectual property

owners could have trademark rights in a particular mark, multiple Trademark Claims
for the same string were accepted. All applications were logged into a Trademark
Claims database managed by Neustar.

The Trademark Claimant was required to provide various information about their
trademark rights, including the:

- Particular trademark or service mark relied on for the trademark Claim
- Date a trademark application on the mark was filed, if any, on the string of the
domain name
- Country where the mark was filed, if applicable
- Registration date, if applicable
- Class or classes of goods and services for which the trademark or service mark was
registered
- Name of a contact person with whom to discuss the claimed trademark rights.

Once all Trademark Claims and domain name applications were collected, Neustar then
compared the claims contained within the Trademark Claims database with its database
of collected domain name applications (DNAs). In the event of a match between a
Trademark Claim and a domain name application, an e-mail message was sent to the
domain name applicant notifying the applicant of the existing Trademark Claim. The
e-mail also stressed that if the applicant chose to continue the application process
and was ultimately selected as the registrant, the applicant would be subject to
Neustar's dispute proceedings if challenged by the Trademark Claimant for that
particular domain name.

The domain name applicant had the option to proceed with the application or cancel
the application. Proceeding on an application meant that the applicant wanted to go
forward and have the application proceed to registration despite having been
notified of an existing Trademark Claim. By choosing to "cancel," the applicant made
a decision in light of an existing Trademark Claim notification to not proceed.

If the applicant did not respond to the e-mail notification from Neustar, or elected
to cancel the application, the application was not processed. This resulted in
making the applicant ineligible to register the actual domain name. If the applicant
affirmatively elected to continue the application process after being notified of
the claimant's (or claimants') alleged trademark rights to the desired domain name,
Neustar processed the application.

This process is very similar to the one ultimately adopted by ICANN and incorporated
in the latest version of the Applicant Guidebook. Although the collection of
Trademark Claims for new gTLDs will be by the Trademark Clearinghouse, many of the
aspects of Neustar's Trademark Claims process in 2001 are similar to those in the
Applicant Guidebook. This makes Neustar uniquely qualified to implement the new
gTLD Trademark Claims process.

29.1.2 Uniform Dispute Resolution Policy (UDRP) and Uniform Rapid Suspension (URS)

29.1.2.1 UDRP

Prior to joining Neustar, Mr. Jeff Neuman was a key contributor to the development
of the Uniform Dispute Resolution Policy ("UDRP") in 1998. This became the first
"Consensus Policy" of ICANN and has been required to be implemented by all domain
name registries since that time.   The UDRP is intended as an alternative dispute
resolution process to transfer domain names from those that have registered and used
domain names in bad faith. Although there is not much of an active role that the
domain name registry plays in the implementation of the UDRP, Neustar has closely
monitored UDRP decisions that have involved the TLDs for which it supports and
ensures that the decisions are implemented by the registrars supporting its TLDs.
When alerted by trademark owners of failures to implement UDRP decisions by its
registrars, Neustar either proactively implements the decisions itself or reminds
the offending registrar of its obligations to implement the decision.

29.1.2.2 URS

In response to complaints by trademark owners that the UDRP was too cost prohibitive
and slow, and the fact that more than 70 percent of UDRP cases were "clear cut"
cases of cybersquatting, ICANN adopted the IRT's recommendation that all new gTLD
registries be required, pursuant to their contracts with ICANN, to take part in a

Uniform Rapid Suspension System ("URS"). The purpose of the URS is to provide a more cost effective and timely mechanism for brand owners than the UDRP to protect their trademarks and to promote consumer protection on the Internet.

The URS is not meant to address Questionable cases of alleged infringement (e.g., use of terms in a generic sense) or for anti-competitive purposes or denial of free speech, but rather for those cases in which there is no genuine contestable issue as to the infringement and abuse that is taking place.

Unlike the UDRP which requires little involvement of gTLD registries, the URS envisages much more of an active role at the registry-level. For example, rather than requiring the registrar to lock down a domain name subject to a UDRP dispute, it is the registry under the URS that must lock the domain within 24hours of receipt of the complaint from the URS Provider to restrict all changes to the registration data, including transfer and deletion of the domain names.

In addition, in the event of a determination in favor of the complainant, the registry is required to suspend the domain name. This suspension remains for the balance of the registration period and would not resolve the original website. Rather, the nameservers would be redirected to an informational web page provided by the URS Provider about the URS.
Additionally, the WHOIS reflects that the domain name will not be able to be transferred, deleted, or modified for the life of the registration. Finally, there is an option for a successful complainant to extend the registration period for one additional year at commercial rates.

Booking.com is fully aware of each of these requirements and will have the capability to implement these requirements for new gTLDs in .hotels. In fact, during the IRT's development of the URS, Neustar began examining the implications of the URS on its registry operations and provided the IRT with feedback on whether the recommendations from the IRT would be feasible for registries to implement.

Although there have been a few changes to the URS since the IRT recommendations, Neustar continued to participate in the development of the URS by providing comments to ICANN, many of which were adopted. As a result, Neustar is committed to supporting the URS for all of the registries that it provides back-end registry services.

29.1.3 Implementation of Thick WHOIS

The .hotels registry will include a thick WHOIS database as required in Specification 4 of the Registry agreement. A thick WHOIS provides numerous advantages including a centralized location of registrant information, the ability to more easily manage and control the accuracy of data, and a consistent user experience.

29.1.4 Policies Handling Complaints Regarding Abuse

In addition the Rights Protection mechanisms addressed above, Booking.com will implement a number of measures to handle complaints regarding the abusive registration of domain names in its TLD as described in its response to Question 28.

29.1.4.1 Registry Acceptable Use Policy

One of the key policies each new gTLD registry is the need to have is an Acceptable Use Policy that clearly delineates the types of activities that constitute "abuse" and the repercussions associated with an abusive domain name registration. The policy must be incorporated into the applicable Registry-Registrar Agreement and reserve the right for the registry to take the appropriate actions based on the type of abuse. This may include locking down the domain name preventing any changes to the contact and nameserver information associated with the domain name, placing the domain name "on hold" rendering the domain name non-resolvable, transferring to the domain name to another registrar, and⁄or in cases in which the domain name is associated with an existing law enforcement investigation, substituting name servers to collect information about the DNS queries to assist the investigation. .hotels's Acceptable Use Policy, set forth in our response to Question 28, will include prohibitions on phishing, pharming, dissemination of malware, fast flux hosting, hacking, and child pornography. In addition, the policy will include the right of the registry to take action necessary to deny, cancel, suspend, lock, or transfer

any registration in violation of the policy.

29.1.4.2 Monitoring for Malicious Activity

Booking.com is committed to ensuring that those domain names associated with abuse
or malicious conduct in violation of the Acceptable Use Policy for .hotels are dealt
with in a timely and decisive manner. These include taking action against those
domain names that are being used to threaten the stability and security of the TLD,
or is part of a real-time investigation by law enforcement.

Once a complaint is received from a trusted source, third-party, or detected by the
Registry, the Registry will use commercially reasonable efforts to verify the
information in the complaint. If that information can be verified to the best of
the ability of the Registry, the sponsoring registrar will be notified and be given
12 hours to investigate the activity and either take down the domain name by placing
the domain name on hold or by deleting the domain name in its entirety or providing
a compelling argument to the Registry to keep the name in the zone. If the
registrar has not taken the requested action after the 12-hour period (i.e., is
unresponsive to the request or refuses to take action), the Registry will place the
domain on "ServerHold". Although this action removes the domain name from the TLD
zone, the domain name record still appears in the TLD WHOIS database so that the
name and entities can be investigated by law enforcement should they desire to get
involved.

29.2 Safeguards against Unqualified Registrations

Pre-Authorization and Authentication

Prior to the release of any domain names, Applicant will designate that only
designated employees will be authorized to register domain names within the TLD
under strict domain name registration guidelines. Also, Applicant's registrar will
verify the authenticity of the registrant. Additionally, prior to registration,
registrar will validate contact information before the prospective registrant is
allowed to proceed.

A variety of automated and manual procedures may be utilized for verification by the
registrar as specified below:

- Applicant's registrar's automated authentication process will authenticate that
the prospective registrant to verify authenticity;
- Applicant's registrar's will authenticate that the registrant's email is from
Applicant based on a list of pre-approved email extensions from authorized related
companies;
- If authenticated, the registrant will be allowed to submit and complete
registrations;
- If the registrant cannot be verified by the registrar, the registrar will contact
the registry to determine eligibility;
- Registrant must represent and warrant that neither the registration of the desired
domain name, nor the manner in which the registration will be used, infringes the
legal rights of third parties.

29.3 Resourcing Plans

The rights protection mechanisms described in the response above involve a wide
range of Neustar tasks, procedures, and systems. The responsibility for each
mechanism varies based on the specific requirements. In general the development of
applications such as sunrise and IP claims is the responsibility of the Engineering
team, with guidance from the Product Management team. Customer Support and Legal
play a critical role in enforcing certain policies such as the rapid suspension
process.   These teams have years of experience implementing these or similar
processes.

The necessary resources will be pulled from the pool of available resources
described in detail in the response to Question 31. The following resources are
available from those teams:

Development∕Engineering – 19 employees
Product Management- 4 employees
Customer Support – 12 employees

The resources are more than adequate to support the rights protection mechanisms of the .hotels registry.

30(a). Security Policy: Summary of the security policy for the proposed registry

Response to Question 30a - Security

30.(a).1 Security Policies

Booking.com and its back-end operator, Neustar, Inc, recognize the vital need to secure the systems and the integrity of the data in commercial solutions. The .hotels registry solution will leverage industry-best security practices including the consideration of physical, network, server, and application elements. Neustar's approach to information security starts with comprehensive information security policies. These are based on the industry best practices for security including SANS (SysAdmin, Audit, Network, Security) Institute, NIST (National Institute of Standards and Technology), and Center for Internet Security (CIS). Policies are reviewed annually by Neustar's information security team.

The following is a summary of the security policies that will be used in the .hotels registry, including:

1.   Summary of the security policies used in the registry operations
2.   Description of independent security assessments
3.   Description of security features that are appropriate for .hotels
4.   List of commitments made to registrants regarding security levels

All of the security policies and levels described in this section are appropriate for the .hotels registry.

30.(a).2 Summary of Security Policies

Neustar has developed a comprehensive Information Security Program in order to create effective administrative, technical, and physical safeguards for the protection of its information assets, and to comply with Neustar's obligations under applicable law, regulations, and contracts. This Program establishes Neustar's policies for accessing, collecting, storing, using, transmitting, and protecting electronic, paper, and other records containing sensitive information.

The Program defines:

- The policies for internal users and our clients to ensure the safe, organized and fair use of information resources.
- The rights that can be expected with that use.
- The standards that must be met to effectively comply with policy.
- The responsibilities of the owners, maintainers, and users of Neustar's information resources.
- Rules and principles used at Neustar to approach information security issues

The following policies are included in the Program:

1. Acceptable Use Policy
The Acceptable Use Policy provides the "rules of behavior" covering all Neustar Associates for using Neustar resources or accessing sensitive information.

2. Information Risk Management Policy
The Information Risk Management Policy describes the requirements for the on-going information security risk management program, including defining roles and responsibilities for conducting and evaluating risk assessments, assessments of technologies used to provide information security and monitoring procedures used to measure policy compliance.

3. Data Protection Policy
The Data Protection Policy provides the requirements for creating, storing,

transmitting, disclosing, and disposing of sensitive information, including data classification and labeling requirements, the requirements for data retention. Encryption and related technologies such as digital certificates are also covered under this policy.

4. Third Party Policy
The Third Party Policy provides the requirements for handling service provider contracts, including specifically the vetting process, required contract reviews, and on-going monitoring of service providers for policy compliance.

5. Security Awareness and Training Policy
The Security Awareness and Training Policy provide the requirements for managing the on-going awareness and training program at Neustar. This includes awareness and training activities provided to all Neustar Associates.

6. Incident Response Policy
The Incident Response Policy provides the requirements for reacting to reports of potential security policy violations. This policy defines the necessary steps for identifying and reporting security incidents, remediation of problems, and conducting "lessons learned" post-mortem reviews in order to provide feedback on the effectiveness of this Program. Additionally, this policy contains the requirement for reporting data security breaches to the appropriate authorities and to the public, as required by law, contractual requirements, or regulatory bodies.

7. Physical and Environmental Controls Policy
The Physical and Environment Controls Policy provides the requirements for securely storing sensitive information and the supporting information technology equipment and infrastructure. This policy includes details on the storage of paper records as well as access to computer systems and equipment locations by authorized personnel and visitors.

8. Privacy Policy
Neustar supports the right to privacy, including the rights of individuals to control the dissemination and use of personal data that describes them, their personal choices, or life experiences. Neustar supports domestic and international laws and regulations that seek to protect the privacy rights of such individuals.

9. Identity and Access Management Policy
The Identity and Access Management Policy covers user accounts (login ID naming convention, assignment, authoritative source) as well as ID lifecycle (request, approval, creation, use, suspension, deletion, review), including provisions for system∕application accounts, shared∕group accounts, guest∕public accounts, temporary∕emergency accounts, administrative access, and remote access. This policy also includes the user password policy requirements.

10. Network Security Policy
The Network Security Policy covers aspects of Neustar network infrastructure and the technical controls in place to prevent and detect security policy violations.

11. Platform Security Policy
The Platform Security Policy covers the requirements for configuration management of servers, shared systems, applications, databases, middle-ware, and desktops and laptops owned or operated by Neustar Associates.

12. Mobile Device Security Policy
The Mobile Device Policy covers the requirements specific to mobile devices with information storage or processing capabilities. This policy includes laptop standards, as well as requirements for PDAs, mobile phones, digital cameras and music players, and any other removable device capable of transmitting, processing or storing information.

13. Vulnerability and Threat Management Policy
The Vulnerability and Threat Management Policy provides the requirements for patch management, vulnerability scanning, penetration testing, threat management (modeling and monitoring) and the appropriate ties to the Risk Management Policy.

14. Monitoring and Audit Policy
The Monitoring and Audit Policy covers the details regarding which types of computer events to record, how to maintain the logs, and the roles and responsibilities for

how to review, monitor, and respond to log information. This policy also includes the requirements for backup, archival, reporting, forensics use, and retention of audit logs.

15. Project and System Development and Maintenance Policy
The System Development and Maintenance Policy covers the minimum security requirements for all software, application, and system development performed by or on behalf of Neustar and the minimum security requirements for maintaining information systems.

30.(a).3 Independent Assessment Reports

Neustar IT Operations is subject to yearly Sarbanes-Oxley (SOX), Statement on Auditing Standards #70 (SAS70) and ISO audits. Testing of controls implemented by Neustar management in the areas of access to programs and data, change management and IT Operations are subject to testing by both internal and external SOX and SAS70 audit groups. Audit Findings are communicated to process owners, Quality Management Group and Executive Management. Actions are taken to make process adjustments where required and remediation of issues is monitored by internal audit and QM groups. External Penetration Test is conducted by a third party on a yearly basis. As authorized by Neustar, the third party performs an external Penetration Test to review potential security weaknesses of network devices and hosts and demonstrate the impact to the environment. The assessment is conducted remotely from the Internet with testing divided into four phases:

- A network survey is performed in order to gain a better knowledge of the network that was being tested
- Vulnerability scanning is initiated with all the hosts that are discovered in the previous phase
- Identification of key systems for further exploitation is conducted
- Exploitation of the identified systems is attempted.

Each phase of the audit is supported by detailed documentation of audit procedures and results. Identified vulnerabilities are classified as high, medium and low risk to facilitate management's prioritization of remediation efforts. Tactical and strategic recommendations are provided to management supported by reference to industry best practices.

30.(a).4 Augmented Security Levels and Capabilities

There are no increased security levels specific for .hotels. However, Neustar will provide the same high level of security provided across all of the registries it manages.
A key to Neustar's Operational success is Neustar's highly structured operations practices. The standards and governance of these processes:

- Include annual independent review of information security practices
- Include annual external penetration tests by a third party
- Conform to the ISO 9001 standard (Part of Neustar's ISO-based Quality Management System)
- Are aligned to Information Technology Infrastructure Library (ITIL) and CoBIT best practices
- Are aligned with all aspects of ISO IEC 17799
- Are in compliance with Sarbanes-Oxley (SOX) requirements (audited annually)
- Are focused on continuous process improvement (metrics driven with product scorecards reviewed monthly).

A summary view to Neustar's security policy in alignment with ISO 17799 can be found in section 30.(a).4 below.

30.(a).5 Commitments and Security Levels

The .hotels registry commits to high security levels that are consistent with the needs of the TLD. These commitments include:

Compliance with High Security Standards

- Security procedures and practices that are in alignment with ISO 17799
- Annual SOC 2 Audits on all critical registry systems

- Annual 3rd Party Penetration Tests
- Annual Sarbanes Oxley Audits

Highly Developed and Document Security Policies

- Compliance with all provisions described in section 30.(a).4 below and in the attached security policy document.
- Resources necessary for providing information security
- Fully documented security policies
- Annual security training for all operations personnel

High Levels of Registry Security

- Multiple redundant data centers
- High Availability Design
- Architecture that includes multiple layers of security
- Diversified firewall and networking hardware vendors
- Multi-factor authentication for accessing registry systems
- Physical security access controls
- A 24x7 manned Network Operations Center that monitors all systems and applications
- A 24x7 manned Security Operations Center that monitors and mitigates DDoS attacks
- DDoS mitigation using traffic scrubbing technologies

Annex 2.

New gTLD Application Submitted to ICANN by: Despegar Online SRL

String: HOTEIS

Originally Posted: 13 June 2012

Application ID: 1-1249-87712

Applicant Information

1. Full legal name

Despegar Online SRL

2. Address of the principal place of business

Contact Information Redacted

3. Phone number

Contact Information Redacted

4. Fax number

Contact Information Redacted

5. If applicable, website or URL

http://www.despegar.com

Primary Contact

6(a). Name

Joshua Bourne

6(b). Title

Managing Partner

6(c). Address

6(d). Phone Number

Contact Information Redacted

6(e). Fax Number

6(f). Email Address

Contact Information Redacted

Secondary Contact

7(a). Name

Martín Rastellino

7(b). Title

President

7(c). Address

7(d). Phone Number

Contact Information Redacted

7(e). Fax Number

7(f). Email Address

Contact Information Redacted

Proof of Legal Establishment

8(a). Legal form of the Applicant

Corporation

8(b). State the specific national or other jursidiction that defines the type of entity identified in 8(a).

Montevideo, Uruguay

8(c). Attach evidence of the applicant's establishment.

Attachments are not displayed on this form.

9(a). If applying company is publicly traded, provide the exchange and symbol.

9(b). If the applying entity is a subsidiary, provide the parent company.

SATYLCA S.A.

9(c). If the applying entity is a joint venture, list all joint venture partners.

Applicant Background

11(a). Name(s) and position(s) of all directors

Martín Rastellino	President

11(b). Name(s) and position(s) of all officers and partners

Alejandro Tamer	Vice President South America & Marketing
Christian Vilate	Vice President Hotels
Edgardo Sokolowicz	Chief Information Officer
Mariano Fiori	Vice President Administration & Finance
Martín Rastellino	President & Chief Operating Officer
Roberto Souviron	Chief Executive Officer

11(c). Name(s) and position(s) of all shareholders holding at least 15% of shares

SATYLCA S.A.	Not Applicable

11(d). For an applying entity that does not have directors, officers, partners, or shareholders: Name(s) and position(s) of all individuals having legal or executive responsibility

Applied-for gTLD string

13. Provide the applied-for gTLD string. If an IDN, provide the U-label.

HOTEIS

14(a). If an IDN, provide the A-label (beginning with "xn--").

14(b). If an IDN, provide the meaning or restatement of the string in English, that is, a description of the literal meaning of the string in the opinion of the applicant.

14(c). If an IDN, provide the language of the label (in English).

14(c). If an IDN, provide the language of the label (as referenced by ISO-639-1).

14(d). If an IDN, provide the script of the label (in English).

14(d). If an IDN, provide the script of the label (as referenced by ISO 15924).

14(e). If an IDN, list all code points contained in the U-label according to Unicode form.

15(a). If an IDN, Attach IDN Tables for the proposed registry.

`Attachments are not displayed on this form.`

15(b). Describe the process used for development of the IDN tables submitted, including consultations and sources used.

15(c). List any variant strings to the applied-for gTLD string according to the relevant IDN tables.

16. Describe the applicant's efforts to ensure that there are no known operational or rendering problems concerning the applied-for gTLD string. If such issues are known, describe steps that will be taken to mitigate these issues in software and other applications.

`Despegar Online SRL foresees no known rendering issues in connection with the`
`proposed .HOTEIS gTLD for which it is applying. This answer is based upon`
`consultation with Despegar's selected back-end provider, Neustar, which has`

successfully launched a number of new gTLDs over the last decade. In reaching this
determination, Neustar analyzed the following data:

-ICANN's Security Stability Advisory Committee (SSAC) entitled Alternative TLD Name
Systems and Roots: Conflict, Control and Consequences (SAC009);
-IAB - RFC3696 "Application Techniques for Checking and Transformation of Names"
-Known software issues which Neustar has encountered during the last decade
launching new gTLDs;
-Character type and length;
-ICANN supplemental notes to Question 16; and
-ICANN's presentation during its Costa Rica regional meeting on TLD Universal
Acceptance.

17. (OPTIONAL) Provide a representation of the label according to the International Phonetic Alphabet (http://www.langsci.ucl.ac.uk/ipa/).

Mission/Purpose

18(a). Describe the mission/purpose of your proposed gTLD.

18.1 Mission and Purpose of .HOTEIS

Despegar Online SRL ("Despegar") is a branch of the largest online travel agency in
Latin America. Despegar's online services enable its customers to book airline
tickets, hotel rooms, rental cars, vacation packages, and other travel-related
services, and also power travel bookings for various airlines, hotels, rental car
agencies, and other tourism-related organizations internationally. Despegar serves
more than five million clients annually and has a presence in 21 countries. Its
services and online content are accessible in the .COM gTLD, as well as various
ccTLDs.

Despegar is applying for five gTLDs: .VUELOS and .HOTELES, which target its Spanish-
speaking audiences; .PASSAGENS and .HOTEIS, which target its Portuguese-speaking
audiences; and .HOTEL, which targets its English, Spanish, and Portuguese-speaking
audiences.

The intended future mission and purpose of the .HOTEIS gTLD is to serve as a
trusted, hierarchical, secure, and intuitive namespace provided by Despegar for a
Portuguese-speaking audience. At present, such a dedicated, secure namespace does
not exist; Despegar believes that consumers and travel companies will benefit from
the presence of a secure portal dedicated to serving Portuguese-speaking markets.
Despegar is applying for .HOTEIS, but at the time of filing this application there
has not been enough time, and there is not enough market information available, to
fully analyze and evaluate all potential use case options.

Despegar will be analyzing other gTLD applications and general market adoption to
determine potential use case options to most effectively serve and enhance its
online strategy as a leading provider of travel services. Despegar helps customers
in many parts of the world make various travel arrangements and reservations and
aims to protect its customers and other Internet users from fraudulent information.
The .HOTEIS gTLD will be operated in accordance with the company's targeted focus by
providing a trusted, hierarchical, secure, and intuitive namespace for Internet
users searching for relevant content.

One of Despegar's most important business segments is powering hotel reservations,
and Portuguese-speaking individuals comprise one of its key customer demographics.
The .HOTEIS gTLD will become one of Despegar's core assets as it is intended to
enhance Despegar's online presence and identity; expand its marketing and promotion

efforts; provide a secure channel for hotel bookings and reservations; and create a marketplace dedicated to Portuguese-speaking audiences and markets.

Despegar intends to initially limit registration and use of domain names within .HOTEIS to Despegar and its qualified subsidiaries and affiliates. This initial limited use will allow Despegar to establish its operations and achieve full sustainability. This limited distribution, coupled with the other requirements set forth in Specification 9 of the template Registry Agreement, is intended to exempt Despegar from its annual Code of Conduct Compliance requirements.

After Stage 3 (see below), Despegar will evaluate whether opportunities exist to carry out the business strategy for the .HOTEIS gTLD through expansion that continues the sustainable operations of the registry through fee-based registrations to parties other than Despegar and its qualified subsidiaries and affiliates.

Despegar currently plans a four-stage rollout for the .HOTEIS gTLD:

1. Stage 1
The initial stage of implementation of the gTLD will involve Despegar registering a limited number of .HOTEIS second-level domain names.

This initial use will provide Despegar's IT and security personnel the time to run a number of tests to ensure seamless and secure access using .HOTEIS domain names, interoperability with various software and Web-based applications, and unbroken and secure use of all names. This initial allocation will also allow the appropriate Despegar staff to coordinate with the internal and external staff responsible for the delegation and setup phases of the .HOTEIS gTLD to ensure a proper transition from delegation to full operation.

2. Stage 2
Once all testing has been successfully completed, Despegar will begin allocating domain names in .HOTEIS for more widespread internal corporate use. During this same period of time, Despegar will begin evaluating strategies to potentially migrate traffic away from its current patchwork network of second-level domain names, which are registered in a variety of TLDs, to Despegar's new gTLDs.

It is in Stage 2 that Despegar will evaluate expanding the operations of the gTLD to permit registration by other registrants such as licensees and∕or strategic partners. Should an assessment of its expansion strategy lead to a decision to extend registration rights to other parties, this expansion is currently planned to take place during Stage 3. However, any expansion would be conditioned upon a review of Specification 9 (Registry Code of Conduct) in the template Registry Agreement to ensure compliance with Despegar's business model.

3. Stage 3
Depending on the analysis of the evaluations undertaken in Stage 2, Despegar may implement its decision to extend registration rights to licensees or strategic partners, including, but not limited to, travel companies, hotels, airlines, and other tourism organizations, depending upon compliance with Specification 9 as noted above. The dates of such expansion are subject to change depending upon business, strategic, and industry factors at the time.

After consideration of the following factors: analysis of Despegar's existing domain name portfolio; internal analysis of marketing initiatives; and the fact that Despegar will have full control over the number of registrations in the .HOTEIS namespace, Despegar is confident that the number of domain name registrations will be less than 10,000 in the first five years of operation.

4. Stage 4
Based on its experience with any expansion implemented in Stage 3, Despegar will assess whether its business plan and expansion strategy should be augmented by extending registration rights to a broader class of licensees, including potentially customers of Despegar. It is anticipated by Despegar that changes to the domain name industry will take at least five years to be realized and assessed. Any decision to expand the gTLD beyond corporate, partner, and licensee use will take into account this experience as well as the technical analysis of potential expansion.

Notwithstanding the potential future expanded use of .HOTEIS, Despegar currently anticipates implementing a throttle mechanism to ensure that any proposed expansion

is controlled and responsible.

Specifically, under the anticipated throttle mechanism Despegar would cease registration of domain names to this potential expanded universe of registrants if and when it reaches 90 percent of the annual 50,000-domain name transaction threshold currently provided for in the template Registry Agreement. Despegar believes that is prudent to incorporate this "time-out" into the business plan in order to reevaluate potential future growth and the necessary resources to ensure that this growth does not negatively impact the secure and stable operation of the .HOTEIS namespace when approaching the 50,000-domain name transaction threshold. This proposed "time-out" mechanism is described in greater detail in the responses to the financial questions (Questions 45 through 50) of this application.

The potential use of .HOTEIS will also be driven by Despegar's future business strategies. Utilizing current projections based upon Despegar's existing business, future business plans, current domain name portfolio, and other strategic factors, Despegar estimates second-level domain name registrations to be in line with the projections set forth in the financial template provided in response to Question 46 of this application.

18(b). How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

18.2 How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

Despegar believes that a proposed .HOTEIS gTLD has the potential to offer the following benefits to Internet users and consumers:

-Establish a trusted source of information and an online marketplace for the millions of consumers who make travel reservations through Despegar's websites, as well as serve as a secure point of sale location for numerous global hotel chains, for third parties seeking information, and for the general Internet user population searching for hotel-related content in Portuguese;
-Provide Despegar and its qualified subsidiaries and affiliates with short and memorable Internet addresses; provide increased navigation to products, services, advertising campaigns, public interest content, public awareness initiatives, etc.;
-Minimize the cost and need for defensive registrations because domain names within .HOTEIS will only be allocated internally to Despegar and its qualified subsidiaries and affiliates, at least for the first three years of operation; and
-Develop a potential platform for secure access to, purchase of, and distribution of Despegar's services and information to its Portuguese-speaking consumers, in order to minimize the potential for counterfeit or infringing goods and services.

18.2.1 What is the goal of your proposed gTLD in terms of areas of specialty, service levels, or reputation?

The primary mission and purpose of the .HOTEIS gTLD is to provide a trusted, hierarchical, secure, and intuitive online marketplace to deliver Despegar's content, services, and information relating to hotels and Despegar's other offerings and information to Portuguese-speaking customers, interested parties, and the general Internet population. As Despegar continues to expand, it wishes to pursue and develop opportunities to market and distribute its online content and products to consumers throughout Latin America, the United States, and internationally in numerous languages, including Portuguese, and on various platforms, including the Internet and mobile devices, among others.

The tourism industry and travelers alike increasingly use the Internet as the main portal for making travel reservations. Given the increasing demand to access Despegar's services and products through a variety of channels, including domain names, Despegar believes that a .HOTEIS gTLD has the potential to provide an innovative, virtual avenue to Despegar goods and services that will deepen and broaden its relationship with consumers.

Most importantly, Despegar will be able to provide access to its products and online content in a targeted namespace devoid of piracy, cybersquatting, and other

malicious activities. Providing consumers with a trusted experience is paramount to Despegar, and a .HOTEIS gTLD will be used to further that goal by creating a safe, dedicated marketplace serving Portuguese-speaking consumers and interested parties.

While online travel companies such as Despegar fight a never-ending battle to protect consumers from piracy on the Internet, .HOTEIS would offer consumers a safe and intuitive means to access authorized content from Despegar and its qualified subsidiaries and affiliates, as well as to shop for and make reservations for travel-related services.

18.2.2 What do you anticipate your proposed gTLD will add to the current space, in terms of competition, differentiation, or innovation?

The primary driving factors of the .HOTEIS gTLD are differentiation and innovation. Additionally, Despegar believes that the creation of a specific space dedicated to Portuguese-speaking individuals that are interested in, and businesses that offer, hotel- and travel-related content will benefit this group of consumers and businesses, as well general Internet users. The number of domain names registered will not measure the success of the gTLD, but rather success will be judged by the level of consumer recognition and trust that is placed in the .HOTEIS gTLD. Using this benchmark, Despegar strives to build consumer recognition and trust through the usage of the .HOTEIS gTLD that rises to the level of that found in the .EDU and .GOV gTLDs.

18.2.3 What goals does your proposed gTLD have in terms of user experience?

Despegar believes that the .HOTEIS gTLD will provide a trusted ecosystem experience for Portuguese-speaking individuals and for the millions of consumers worldwide who make reservations through Despegar's sites, as well as those who seek information that Despegar provides. In addition to providing consumers with short, memorable, and intuitive domain names, the .HOTEIS gTLD will indicate to consumers that all domains and content therein are owned and controlled by Despegar, thus protecting users from potential infringing, pirated, or harmful content.

The initial use of the .HOTEIS gTLD will involve Despegar registering a limited number of second-level domain names. This initial use will provide Despegar's IT and security personnel the ability to run a number of tests to ensure seamless and secure access to the Despegar websites, and interoperability with various software and Web-/mobile-based applications. Once appropriate security and stability issues have been satisfactorily addressed, Despegar will likely begin allocating domain names for internal corporate use and may redirect new .HOTEIS domain names to preexisting content. This phased rollout will likely take place over a multi-year period, but is subject to change depending upon a range of external factors.

During this same period of time, Despegar will evaluate potential strategies to use the .HOTEIS gTLD in other ways that will advance Despegar's corporate mission and goals.

18.2.4 Provide a complete description of the applicant's intended registration policies in support of the goals listed above.

Despegar currently intends for the .HOTEIS gTLD to be exclusively used by Despegar and its qualified subsidiaries and affiliates, at least for the first three years of operation. Because of this condition, Despegar intends to address registration and use requirements in its qualified subsidiary and affiliate agreements, rather than in a domain name registration agreement.

Notwithstanding this, Despegar will incorporate all required ICANN consensus policies and other legal/policy requirements imposed on new gTLD applicants into the terms and conditions of the domain name registration agreements.

18.2.5 Will your proposed gTLD impose any measures for protecting the privacy or confidential information of registrants or users? If so, please describe any such measures.

As an Internet-based travel company, Despegar recognizes that this is an evolving area of law in which there is no international standard. However, due to the fact that every domain name will be registered to Despegar and its qualified subsidiaries and affiliates, at least for the first three years of operation, Despegar has a

vested interest in making sure that accurate and current domain name information is readily available in connection with each .HOTEIS domain name. For the .HOTEIS gTLD, all private and confidential information will be protected.

Despegar will ensure that the operation of the .HOTEIS gTLD will be consistent with its privacy policy, available on its website, see http://www.decolar.com/commercial-web/security/confidentiality.

In addition, Despegar intends to incorporate contractual language in its Registry-Registrar Agreement (RRA) modeled after language that has been included in the template Registry Agreement and that has been successfully utilized by existing ICANN gTLD Registry Operators.

The template Registry Agreement states, "Registry Operator shall (i) notify each ICANN-accredited registrar that is a party to the registry-registrar agreement for the TLD of the purposes for which data about any identified or identifiable natural person ("Personal Data") submitted to Registry Operator by such registrar is collected and used under this Agreement or otherwise and the intended recipients (or categories of recipients) of such Personal Data, and (ii) require such registrar to obtain the consent of each registrant in the TLD for such collection and use of Personal Data. Registry Operator shall take reasonable steps to protect Personal Data collected from such registrar from loss, misuse, unauthorized disclosure, alteration or destruction. Registry Operator shall not use or authorize the use of Personal Data in a way that is incompatible with the notice provided to registrars."

18.2.6 Describe whether and in what ways outreach and communications will help to achieve your projected benefits.

Despegar sees the potential for this gTLD to play a large role in Despegar's future online strategic initiatives. However, there are a number of unanswered questions concerning consumer recognition, the adoption of new gTLDs, and the response from search engines in the marketplace that will influence the usage of the gTLD and communication about that usage.

Notwithstanding this, Despegar plans to start using .HOTEIS domains initially as redirects to existing .COM or ccTLD domains. Despegar also plans to carefully review the release of new gTLDs by others, the response from search engines to gTLDs, and the perception of consumers. As the marketplace evolves, Despegar will invest in outreach and communication as needed to ensure that its consumers, partners, and affiliates continue to interact with Despegar content in a simplified and efficient manner.

18(c). What operating rules will you adopt to eliminate or minimize social costs?

18.3 What operating rules will you adopt to eliminate or minimize social costs (e.g., time or financial resource costs, as well as various types of consumer vulnerabilities)?

Despegar's proposed operating rules to limit registration to Despegar and its qualified subsidiaries and affiliates, at least for the first three years of operation, will provide a trusted online environment for consumers to access Despegar's online content, and by default will minimize social costs. This verified ecosystem will provide consumers with a single, trusted source for Despegar goods and services with a substantially lower risk of the fraud, misdirection, infringement, or scams that consumers are plagued with in .COM and other open gTLDs. Despegar does not anticipate consumer vulnerabilities. There will be no need for other trademark and brand owners to defensively register second-level domains in the .HOTEIS gTLD. In fact, Despegar's expectation is that the usage of a .HOTEIS gTLD will eliminate many of the vulnerabilities that Despegar consumers face in the wider Internet today.

18.3.1 What other steps will you take to minimize negative consequences/costs imposed upon consumers?

Despegar believes that the proposed operation of the .HOTEIS gTLD as set forth in

this application has no known negative consequences or cost implications to consumers. On the contrary, the proposed operation of this registry will likely lead to direct and quantifiable benefits to consumers.

18.3.2 How will multiple applications for a particular domain name be resolved, for example, by auction or on a first-come∕first-serve basis?

Despegar does not envision multiple applicants for the same domain name, as domain names will only be allocated to Despegar and its qualified subsidiaries and affiliates, at least for the first three years of operation, in accordance with Despegar's business plan for the .HOTEIS gTLD.

18.3.3 Explain any cost benefits for registrants you intend to implement (e.g., advantageous pricing, introductory discounts, bulk registration discounts).

Despegar does not envision any advantageous pricing, introductory discounts, or bulk registration discounts because these marketing∕commercial initiatives are inconsistent with the mission and purpose of the .HOTEIS gTLD as a trusted online source identifier. Moreover, Despegar currently intends to provide domain name registrations to itself and its qualified subsidiaries and affiliates at no cost, though the company reserves the right to reevaluate this decision and may alter it in the future.

18.3.4 Note that the Registry Agreement requires that registrars be offered the option to obtain initial domain name registrations for periods of one to ten years at the discretion of the registrar, but no greater than ten years. Additionally, the Registry Agreement requires advance written notice of price increases. Do you intend to make contractual commitments to registrants regarding the magnitude of price escalation? If so, please describe your plans.

Despegar is committed to providing the domain name registration periods set forth in the Registry Agreement. However, as noted above, the registration and use of the domain name is conditioned upon a separate qualified subsidiary or affiliate relationship with Despegar. As such, providing contractual commitments in a domain name registrant agreement regarding the magnitude of price escalations does not seem relevant or appropriate. Additionally, as noted above, the current business model envisions Despegar providing domain name registrations to itself and its qualified subsidiaries and affiliates at no cost, at least for the first three years of operation.

Despegar acknowledges that the current template Registry Agreement requires the Registry Operator to "offer registrars the option to obtain registration periods for one to ten years at the discretion of the registrar." However, Despegar and its qualified subsidiaries and affiliates, as the initial sole registrants within the .HOTEIS gTLD, will only be registering domain names annually.

Community-based Designation

19. Is the application for a community-based TLD?

No

20(a). Provide the name and full description of the community that the applicant is committing to serve.

20(b). Explain the applicant's relationship to the community identified in 20(a).

20(c). Provide a description of the community-based purpose of the applied-for gTLD.

20(d). Explain the relationship between the applied-for gTLD string and the community identified in 20(a).

20(e). Provide a description of the applicant's intended registration policies in support of the community-based purpose of the applied-for gTLD.

20(f). Attach any written endorsements from institutions/groups representative of the community identified in 20(a).

Attachments are not displayed on this form.

Geographic Names

21(a). Is the application for a geographic name?

No

Protection of Geographic Names

22. Describe proposed measures for protection of geographic names at the second and other levels in the applied-for gTLD.

22.1 Despegar Online SRL has Properly Researched this Topic

Despegar Online SRL ("Despegar") is keenly aware of the sensitivity of national governments in connection with protecting country and territory identifiers in the Domain Name System ("DNS"). In preparation for answering this question, Despegar reviewed the following relevant background material regarding the protection of geographic names in the DNS:

-ICANN Board Resolution 01-92 regarding the methodology developed for the

reservation and release of country names in the .INFO top-level domain, see http://
www.icann.org/en/minutes/minutes-10sep01.htm;
-ICANN's Proposed Action Plan on .INFO Country Names, see http://www.icann.org/
en/meetings/montevideo/action-plan-country-names-09oct01.htm;
-"Report of the Second WIPO Internet Domain Name Process: The Recognition and Rights
and the Use of Names in the Internet Domain Name System," Section 6, Geographical
Identifiers, see http://www.wipo.int/amc/en/processes/process2/report/
html/report.html;
- ICANN's Governmental Advisory Committee (GAC) Principles Regarding New gTLDs, see
https://gacweb.icann.org/download/attachments/1540128/
gTLD_principles_0.pdf?version=1&modificationDate=1312358178000; and
-ICANN's Generic Names Supporting Organization Reserved Names Working Group – Final
Report, see http://gnso.icann.org/issues/new-gtlds/final-report-rn-wg-23may07.htm.

22.2 Initial Reservation of Country and Territory Names

Despegar is committed to initially reserving the country and territory names
contained in the internationally recognized lists described in Article 5 of
Specification 5 attached to the Applicant Guidebook at the second level and at all
other levels within the .HOTEIS gTLD at which Despegar will provide registrations.
Specifically, Despegar will reserve:

1. The short form (in English) of all country and territory names contained on the
ISO 3166-1 list, as updated from time to time, including the European Union, which
is exceptionally reserved on the ISO 3166-1 list, and its scope extended in August
1999 to any application needing to represent the name European Union, see http://
www.iso.org/iso/support/country_codes/iso_3166_code_lists/
iso-3166-1_decoding_table.htm#EU;

2. The United Nations Group of Experts on Geographical Names, Technical Reference
Manual for the Standardization of Geographical Names, Part III Names of Countries of
the World; and

3. The list of United Nations member states in six official United Nations languages
prepared by the Working Group on Country Names of the United Nations Conference on
the Standardization of Geographical Names.

22.3 Fair & Non-Misleading Use of Geographical Identifiers

Despegar is part of the largest online travel agency in all of Latin America that
enables its customers to book airline tickets, hotel rooms, rental cars, vacation
packages, and other travel-related services, and also powers travel bookings for
various airlines, hotels, rental car agencies, and other tourism-related
organizations internationally. Despegar serves more than five million clients
annually and has a presence in 21 countries. Its services and online content are
accessible in the .COM gTLD and the .AR, .BO, .BR, .CC, .CL, .CO, .CR, .DO, .EC,
.ES, .HN, .MX, PA, .PE, .PR, .PY, .TV, .US, .UY, .VE, and .WS ccTLDs.

Despegar is applying for five generic-term gTLDs: .VUELOS and .HOTELES, which target
Despegar's Spanish-speaking customers and Internet users; .PASSAGENS and .HOTEIS,
which target Despegar's Portuguese-speaking customers and Internet users; and
.HOTEL, which targets Despegar's English, Spanish, and Portuguese-speaking customers
and Internet users.

In providing online content, sales, and services to customers throughout the world,
Despegar makes regular use of geographical identifiers to provide consumers with a
hierarchical and intuitive namespace to navigate for relevant content. For example,
on its home page, users have the ability to select a country in order to receive the
appropriate, geographically specific content, see www.Despegar.com.

Despegar would like to provide a hierarchical and intuitive framework for the
.HOTEIS namespace by using geographical identifiers as second-level domain names.
This use of geographical identifiers to the left of the gTLD and as part of the
domain name itself is believed to have a direct and material impact on search engine
algorithms and their corresponding query results. Despegar would like to see if this
type of hierarchical and intuitive use of second-level domain names within a gTLD
provides increased consumer functionality and innovation, as premised by ICANN.

Currently, Despegar operates a number of corporate websites using a combination of

second-level and top-level domain names. A representative sampling of Despegar websites that incorporate geographical identifiers into the domain name include:

Despegar.cl
Despegar.com.bo
Despegar.com.ve
DespegarPeru.com

Despegar believes that a .HOTEIS gTLD can provide an online, single-source identifying function for its current and future customers around the world, especially Portuguese-speakers who are seeking to make hotel reservations and other travel purchases. This is in contrast to the present approach Despegar has used as it expands into different markets around the world, which consists of registering the domain names that are available, rather than those that may be the most intuitive.

22.4 The Legal Protection of Geographical Identifiers

One of the more authoritative resources on the current state of the law in connection with the protection of geographical identifiers was authored by the World Intellectual Property Organization (WIPO) in its 2001 "Report of the Second WIPO Internet Domain Name Process: The Recognition of Rights and the Use of Names in the Internet Domain Name System" publication. Section six of this report was devoted exclusively to the protection of geographical identifiers.

In analyzing the well-established framework against the misuse of geographical identifiers at the international, regional, and national levels, WIPO identified the following two elements for the protection of geographical identifiers: (i) a prohibition of false descriptions of the geographical source of goods; and (ii) a more extensive set of rules prohibiting the misuse of one class of geographical source indicators, known as geographical indications (see "Report of the Second WIPO Internet Domain Name Process," Paragraphs 206 and 210). Neither false descriptions of the geographical source of goods, nor misuse of geographical indications, is present in Despegar's current or proposed use of geographical identifiers.

Notwithstanding WIPO's recommendation that the protection of geographical identifiers is "a difficult area on which views are not only divided, but also ardently held" (Paragraph 237) national governments within the ICANN Governmental Advisory Committee (GAC) and other international forums have continued to advocate for increased safeguards to protect against the misuse of geographical identifiers within the domain name system.

Despegar, acting as a responsible international business, seeks to minimize any potential business practices that might mislead consumers. However, at the same time, it believes that it is important to be able to use geographical identifiers in a fair use and non-misleading manner, if such use can benefit Internet users as proposed in Despegar's business model.

22.5 Samples of Fair & Non-Misleading Use of Geographical Identifiers

In undertaking a thorough research of this subject matter prior to filing this application, Despegar's subject matter experts were able to uncover the following representative sampling of fair and non-misleading use of geographical identifiers used in the existing gTLD domain name space:

Fair Use of National Geographical Identifiers

AUSTRALIA.COOP – Is operated by Co-operatives Australia, the national body for State Co-operative Federations, and provides a valuable resource about cooperatives within Australia.

USA.JOBS – Is operated by DirectEmployers Association ("DE"). While Employ Media, the registry operator of the .JOBS gTLD, is currently in a dispute with ICANN regarding the allocation of this and other domain names, DE has a series of partnerships and programs with the United States Department of Labor, the National Association of State Workforce Agencies, and Facebook to help unemployed workers find jobs.

MALDIVIAN.AERO – Is the dominant domestic air carrier in Maldives, and provides a

range of commercial and leisure air transport services.

Fair Use of Regional∕Local Geographical Indicators

BROOKLYN.COOP - Is operated by Brooklyn Cooperative Federal Credit Union, which began as a modest storefront business in 2001, but is now New York City's fastest growing credit union and a model for community development credit unions nationwide.

HYDERABAD.AERO - Is operated by the Hyderabad International Airport and provides a range of interactive services and information for both business and leisure travelers.

SACRAMENTO.AERO - Is a portal website operated by Sacramento County to provide links to each of the airports serving the Sacramento area: Sacramento International Airport (SMF), Mather Airport (MHR), Executive Airport (SAC), and Franklin Field (F72).

22.6 Protection of Regional and Local Geographic Names for Non-Misleading Use

Despegar has stated its intention to consider using non-reserved geographic identifiers as part of a hierarchical and intuitive framework in a fair and non-misleading manner to help consumers navigate the .HOTEIS namespace. Despegar is committed to operating the .HOTEIS namespace in a manner that minimizes potential consumer confusion, and will actively work with others in the ICANN community regarding any future policy development in this area.

22.7 Potential Future Release of Initially Reserved Names

Given that Despegar is an international organization currently operating in numerous countries, Despegar looks forward to collaborating with other new gTLD registry operators in potentially working with ICANN's GAC to explore potential processes that could permit the release of initially reserved country names (including ISO-3166 two-characters). Specifically, Despegar is interested in exploring other Registry Service Evaluation Processes (RSEP) that have been filed by existing gTLD registry operators in releasing previously reserved domain names.

22.8 Dispute Resolution

Despegar does not envision any potential disputes from governments or public authorities in connection with the registration and use of geographic names within the .HOTEIS gTLD based upon its proposed use, set forth in the response to Question 18 of this application.

However, Despegar is committed to working with governments, public authorities, or IGOs that may have a concern regarding the registration of names with national or geographic significance at the second level within .HOTEIS. Therefore, should there arise any potential disputes, Despegar will undertake an immediate policy development process as identified below.

22.9 Creation and Updating the Policies

If there should arise some future need for the creation or updating of the policies regarding this class of domain names, Despegar will act in an open and transparent manner consistent with its prior practices to develop such a policy and∕or recommendation.

Despegar is also committed to continually reviewing and updating these lists to prevent the misleading use of geographical identifiers. Consistent with this commitment, Despegar intends to remain an active participant in any ongoing ICANN policy discussion regarding the protection of geographic names within the DNS.

Registry Services

23. Provide name and full description of all the Registry Services to be provided.

23.1 Introduction
Despegar Online SRL ("Despegar") has elected to partner with Neustar, Inc.
("Neustar") to provide back-end services for the .HOTEIS registry. In making this
decision, Despegar recognized that Neustar already possesses a production-proven
registry system that can be quickly deployed and smoothly operated over its robust,
flexible, and scalable world-class infrastructure. The existing registry services
will be leveraged for the .HOTEIS registry. The following section describes the
registry services to be provided.
23.2 Standard Technical and Business Components
Neustar will provide the highest level of service while delivering a secure, stable
and comprehensive registry platform. Despegar will use Neustar's Registry Services
platform to deploy the .HOTEIS registry, by providing the following Registry
Services (none of these services are offered in a manner that is unique to .HOTEIS:
Registry-Registrar Shared Registration Service (SRS)
Extensible Provisioning Protocol (EPP)
Domain Name System (DNS)
WHOIS
DNSSEC
Data Escrow
Dissemination of Zone Files using Dynamic Updates
Access to Bulk Zone Files
Dynamic WHOIS Updates
IPv6 Support
Rights Protection Mechanisms
Internationalized Domain Names (IDN)
The following is a description of each of the services:
SRS
Neustar's secure and stable SRS is a production-proven, standards-based, highly
reliable, and high-performance domain name registration and management system. The
SRS includes an EPP interface for receiving data from registrars for the purpose of
provisioning and managing domain names and name servers. The response to Question
24 provides specific SRS information.
EPP
The .HOTEIS registry will use the Extensible Provisioning Protocol (EPP) for the
provisioning of domain names. The EPP implementation will be fully compliant with
all RFCs. Registrars are provided with access via an EPP API and an EPP based Web
GUI. With more than 10 gTLD, ccTLD, and private TLDs implementations, Neustar has
extensive experience building EPP-based registries. Additional discussion on the
EPP approach is presented in the response to Question 25.
DNS
Despegar will leverage Neustar's world-class DNS network of geographically
distributed nameserver sites to provide the highest level of DNS service. The
service utilizes "Anycast" routing technology, and supports both IPv4 and IPv6. The
DNS network is highly proven, and currently provides service to over 20 TLDs and
thousands of enterprise companies. Additional information on the DNS solution is
presented in the response to Questions 35.
WHOIS
Neustar's existing standard WHOIS solution will be used for the .HOTEIS. The
service provides supports for near real-time dynamic updates. The design and
construction is agnostic with regard to data display policy and is flexible enough
to accommodate any data model. In addition, a searchable WHOIS service that complies
with all ICANN requirements will be provided. The following WHOIS options will be
provided:
Standard WHOIS (Port 43)
Standard WHOIS (Web)
Searchable WHOIS (Web)
DNSSEC
An RFC compliant DNSSEC implementation will be provided using existing DNSSEC
capabilities. Neustar is an experienced provider of DNSSEC services, and currently
manages signed zones for three large top level domains: .BIZ, .US, and .CO.
Registrars are provided with the ability to submit and manage DS records using EPP,
or through a web GUI. Additional information on DNSSEC, including the management of
security extensions is found in the response to Question 43.
Data Escrow
Data Escrow will be performed in compliance with all ICANN requirements in

conjunction with an approved Data Escrow provider. The Data Escrow service will:
Protect against data loss
Follow industry best practices
Ensure easy, accurate, and timely retrieval and restore capability in the event of a
hardware failure
Minimizes the impact of software or business failure.
Additional information on the Data Escrow service is provided in the response to
Question 38.
Dissemination of Zone Files using Dynamic Updates
Dissemination of zone files will be provided through a dynamic, near real-time
process. Updates will be performed within the specified performance levels. The
proven technology ensures that updates pushed to all nodes within a few minutes of
the changes being received by the SRS. Additional information on the DNS updates
may be found in the response to Question 35.
Access to Bulk Zone Files
Despegar will provide third-party access to the bulk zone file in accordance with
Specification 4, Section 2 of the Registry Agreement. Credentialing and
dissemination of the zone files will be facilitated through the Central Zone Data
Access Provider.
Dynamic WHOIS Updates
Updates to records in the WHOIS database will be provided via dynamic, near
real-time updates. Guaranteed delivery message oriented middleware is used to
ensure each individual WHOIS server is refreshed with dynamic updates. This
component ensures that all WHOIS servers are kept current as changes occur in the
SRS, while also decoupling WHOIS from the SRS. Additional information on WHOIS
updates is presented in response to Question 26.
IPv6 Support
The .HOTEIS registry will provide IPv6 support in the following registry services:
SRS, WHOIS, and DNS∕DNSSEC. In addition, the registry supports the provisioning of
IPv6 AAAA records. A detailed description on IPv6 is presented in the response to
Question 36.
Required Rights Protection Mechanisms
Despegar will provide all ICANN required Rights Mechanisms, including:
Trademark Claims Service
Trademark Post-Delegation Dispute Resolution Procedure (PDDRP)
Registration Restriction Dispute Resolution Procedure (RRDRP)
UDRP
URS
Sunrise service
More information is presented in the response to Question 29.
Internationalized Domain Names (IDN)
IDN registrations are provided in full compliance with the IDNA protocol. Neustar
possesses extensive experience offering IDN registrations in numerous TLDs, and its
IDN implementation uses advanced technology to accommodate the unique bundling needs
of certain languages. Character mappings are easily constructed to block out
characters that may be deemed as confusing to users. A detailed description of the
IDN implementation is presented in response to Question 44.
23.3 Unique Services
The only unique service that Despegar is considering at this time is the potential
imposition of an annual cost recovery based fee to validate registrars that will be
providing domain name registration services in the .HOTEIS gTLD.

An additional service which Despegar may offer, commonly used in the marketplace
today, is the use of RFPs (Request for Proposals) and Auctions to determine string
allocation in appropriate circumstances.
23.4 Security or Stability Concerns
All services offered are standard registry services that have no known security or
stability concerns. Neustar has demonstrated a strong track record of security and
stability within the industry.

Demonstration of Technical & Operational Capability

24. Shared Registration System (SRS) Performance

24.1 Introduction
Despegar Online SRL ("Despegar") has partnered with Neustar, Inc. ("Neustar") an
experienced TLD Registry Operator, for the operation of the .HOTEIS registry.
Despegar is confident that the plan in place for the operation of a robust and
reliable Shared Registration System (SRS) as currently provided by Neustar will
satisfy the criterion established by ICANN.
Neustar built its SRS from the ground up as an EPP-based platform and has been
operating it reliably and at scale since 2001. The software currently provides
registry services to five TLDs (.BIZ, .US, TEL, .CO, and .TRAVEL) and is used to
provide gateway services to the .CN and .TW registries. Neustar's state-of-the-art
registry has a proven track record of being secure, stable, and robust. It manages
more than 6 million domains, and has over 300 registrars connected today.
The following describes a detailed plan for a robust and reliable SRS that meets all
ICANN requirements including compliance with Specifications 6 and 10.
24.2 The Plan for Operation of a Robust and Reliable SRS
High-level SRS System Description
The SRS to be used for .HOTEIS will leverage a production-proven, standards-based,
highly reliable and high-performance domain name registration and management system
that fully meets or exceeds the requirements as identified in the New gTLD Applicant
Guidebook.
The SRS is the central component of any registry implementation and its quality,
reliability, and capabilities are essential to the overall stability of the TLD.
Neustar has a documented history of deploying SRS implementations with proven and
verifiable performance, reliability, and availability. The SRS adheres to all
industry standards and protocols. By leveraging an existing SRS platform, Despegar
is mitigating the significant risks and costs associated with the development of a
new system. Highlights of the SRS include:
State-of-the-art, production-proven, multi-layer design;
Ability to rapidly and easily scale from low to high volume as a TLD grows;
Fully redundant architecture at two sites;
Support for IDN registrations in compliance with all standards;
Use by over 300 Registrars;
EPP connectivity over IPv6;
Performance being measured using 100% of all production transactions (not sampling);
and
SRS Systems, Software, Hardware, and Interoperability.
The systems and software that the registry operates on are a critical element to
providing a high quality of service. If the systems are of poor quality, if they are
difficult to maintain and operate, or if the registry personnel are unfamiliar with
them, the registry will be prone to outages. Neustar has a decade of experience
operating registry infrastructure to extremely high service level requirements. The
infrastructure is designed using best of breed systems and software. Much of the
application software that performs registry-specific operations was developed by the
current engineering team and as a result, the team is intimately familiar with its
operations.
The architecture is highly scalable and provides the same high level of availability
and performance as volumes increase. It combines load-balancing technology with
scalable server technology to provide a cost effective and efficient method for
scaling.
The registry is able to limit the ability of any one registrar from adversely
impacting other registrars by consuming too many resources due to excessive EPP
transactions. The system uses network layer 2 level packet shaping to limit the
number of simultaneous connections registrars can open to the protocol layer.
All interaction with the registry is recorded in log files. Log files are generated
at each layer of the system. These log files record at a minimum:
The IP address of the client;
Timestamp;
Transaction Details; and
Processing Time.
In addition to logging of each and every transaction with the SRS, Neustar maintains
audit records, in the database, of all transformational transactions. These audit
records allow the registry, in support of Despegar, to produce a complete history of
changes for any domain name.
SRS Design
The SRS incorporates a multi-layer architecture that is designed to mitigate risks
and easily scale as volumes increase. The three layers of the SRS are:
Protocol Layer;

Business Policy Layer; and
Database.
Each of the layers is described below.
Protocol Layer
The first layer is the protocol layer, which includes the EPP interface to
registrars. It consists of a high availability farm of load-balanced EPP servers.
The servers are designed to be fast processors of transactions. The servers perform
basic validations and then feed information to the business policy engines as
described below. The protocol layer is horizontally scalable as dictated by volume.
The EPP servers authenticate against a series of security controls before granting
service, as follows:
The registrar's host exchanges keys to initiates a TLS handshake session with the
EPP server.
The registrar's host must provide credentials to determine proper access levels.
The registrar's IP address must be preregistered in the network firewalls and
traffic-shapers.
Business Policy Layer
The Business Policy Layer is the "brain" of the registry system. Within this layer,
the policy engine servers perform rules-based processing as defined through
configurable attributes. This process takes individual transactions, applies various
validation and policy rules, persists data, and dispatches notification through the
central database in order to publish to various external systems. External systems
fed by the Business Policy Layer include back-end processes such as dynamic update
of DNS, WHOIS, and Billing.
Similar to the EPP protocol farm, the SRS consists of a farm of application servers
within this layer. This design ensures that there is sufficient capacity to process
every transaction in a manner that meets or exceeds all service level requirements.
Some registries couple the business logic layer directly in the protocol layer or
within the database. This architecture limits the ability to scale the registry.
Using a decoupled architecture enables the load to be distributed among farms of
inexpensive servers that can be scaled up or down as demand changes.
The SRS today processes over 30 million EPP transactions daily.
Database
The database is the third core component of the SRS. The primary function of the SRS
database is to provide highly reliable, persistent storage for all registry
information required for domain registration services. The database is highly
secure, with access limited to transactions from authenticated registrars, trusted
application-server processes, and highly restricted access by the registry database
administrators. A full description of the database can be found in response to
Question 33.
See attachment: Figure 24-1, which depicts the overall SRS architecture including
network components. This multi-layer architecture is EPP-compliant, meets all
applicable RFCs, and its development follows industry best-practices.
Number of Servers
As depicted in the SRS architecture diagram above, Neustar operates a high
availability architecture where at each level of the stack there are no single
points of failures. Each of the network level devices run with dual pairs, as do the
databases. For the .HOTEIS registry, the SRS will operate with 8 protocol servers
and 6 policy engine servers. These expand horizontally as volume increases due to
additional TLDs, increased load, and through organic growth. In addition to the SRS
servers described above, there are multiple back-end servers for services such as
DNS and WHOIS. These are discussed in detail within those respective response
sections.
Description of Interconnectivity with Other Registry Systems
The core SRS service interfaces with other external systems via Neustar's external
systems layer. The services that the SRS interfaces with include:
WHOIS;
DNS;
Billing; and
Data Warehouse (Reporting and Data Escrow).
Other external interfaces may be deployed to meet the unique needs of a TLD. At this
time there are no additional interfaces planned for .HOTEIS.
The SRS includes an "External Notifier" concept in its business policy engine as a
message dispatcher. This design allows time-consuming back-end processing to be
decoupled from critical online registrar transactions. Using an External Notifier
solution, the registry can utilize "control levers" that allow it to tune or to
disable processes to ensure optimal performance at all times. For example, during
the early minutes of a TLD launch, when unusually high volumes of transactions are
expected, the registry can elect to suspend processing of one or more back-end

systems in order to ensure that greater processing power is available to handle the increased load requirements. This proven architecture has been used with numerous TLD launches, some of which have involved the processing of over tens of millions of transactions in the opening hours. The following are the standard three External Notifiers used the SRS:

WHOIS External Notifier

The WHOIS External Notifier dispatches a work item for any EPP transaction that may potentially have an impact on WHOIS. It is important to note that, while the WHOIS External Notifier feeds the WHOIS system, it intentionally does not have visibility into the actual contents of the WHOIS system. The WHOIS External Notifier serves just as a tool to send a signal to the WHOIS system that a change is ready to occur. The WHOIS system possesses the intelligence and data visibility to know exactly what needs to change in WHOIS. See response to Question 26 for greater detail.

DNS External Notifier

The DNS External Notifier dispatches a work item for any EPP transaction that may potentially have an impact on DNS. Like the WHOIS External Notifier, the DNS External Notifier does not have visibility into the actual contents of the DNS zones. The work items that are generated by the notifier indicate to the dynamic DNS update sub-system that a change occurred that may impact DNS. That DNS system has the ability to decide what actual changes must be propagated out to the DNS constellation. See response to Question 35 for greater detail.

Billing External Notifier

The Billing External Notifier is responsible for sending all billable transactions to the downstream financial systems for billing and collection. This External Notifier contains the necessary logic to determine what types of transactions are billable. The financial systems use this information to apply appropriate debits and credits based on registrar.

Data Warehouse

The Data Warehouse is responsible for managing reporting services, including registrar reports, business intelligence dashboards, and the processing of Data Escrow files. The Reporting Database is used to create both internal and external reports, primarily to support registrar billing and contractual reporting requirement. The Data Warehouse databases are updated on a daily basis with full copies of the production SRS data.

Frequency of Synchronization between Servers

The External Notifiers discussed above perform updates in near real-time, well within the prescribed service level requirements. As transactions from registrars update the core SRS, update notifications are pushed to the external systems such as DNS and WHOIS. These updates are typically live in the external system within 2-3 minutes.

Synchronization Scheme (e.g., hot standby, cold standby)

Neustar operates two hot databases within the data center that is operating in primary mode. These two databases are kept in sync via synchronous replication. Additionally, there are two databases in the secondary data center. These databases are updated in real time through asynchronous replication. This model allows for high performance while also ensuring protection of data. See response to Question 33 for greater detail.

Compliance with Specification 6 Section 1.2

The SRS implementation for .HOTEIS is fully compliant with Specification 6, including section 1.2. EPP Standards are described and embodied in a number of IETF RFCs, ICANN contracts and practices, and Registry-Registrar Agreements. Extensible Provisioning Protocol or EPP is defined by a core set of RFCs that standardize the interface that make up the registry-registrar model. The SRS interface supports EPP 1.0 as defined in the following RFCs shown in Table 24-1.

See attachment: Table 24-1.

Additional information on the EPP implementation and compliance with RFCs can be found in the response to Question 25.

Compliance with Specification 10

Specification 10 of the New TLD Registry Agreement defines the performance specifications of the TLD, including service level requirements related to DNS, RDDS (WHOIS), and EPP. The requirements include both availability and transaction response time measurements. As an experienced Registry Operator, Neustar has a long and verifiable track record of providing registry services that consistently exceed the performance specifications stipulated in ICANN agreements. This same high level of service will be provided for the .HOTEIS registry. The following section describes Neustar's experience and its capabilities to meet the requirements in the new agreement.

To properly measure the technical performance and progress of TLDs, Neustar collects data on key essential operating metrics. These measurements are key indicators of

the performance and health of the registry. Neustar's current .BIZ SLA commitments
are among the most stringent in the industry today, and exceed the requirements for
new TLDs. Table 24-2 compares the current SRS performance levels compared to the
requirements for new TLDs, and clearly demonstrates the ability of the SRS to exceed
those requirements.
See attachment: Table 24-2.
Their ability to commit and meet such high performance standards is a direct result
of their philosophy towards operational excellence. See response to Question 31 for
a full description of their philosophy for building and managing for performance.
24.3 Resourcing Plans
The development, customization, and on-going support of the SRS are the
responsibility of a combination of technical and operational teams, including:
Development∕Engineering;
Database Administration;
Systems Administration; and
Network Engineering.
Additionally, if customization or modifications are required, the Product Management
and Quality Assurance teams will be involved in the design and testing. Finally, the
Network Operations and Information Security play an important role in ensuring the
systems involved are operating securely and reliably.
The necessary resources will be pulled from the pool of operational resources
described in detail in the response to Question 31. Neustar's SRS implementation is
very mature, and has been in production for over 10 years. As such, very little new
development related to the SRS will be required for the implementation of the
.HOTEIS registry. The following resources are available from those teams:
Development∕Engineering – 19 employees
Database Administration – 10 employees
Systems Administration – 24 employees
Network Engineering – 5 employees
The resources are more than adequate to support the SRS needs of all the TLDs
operated by Neustar, including the .HOTEIS registry.

25. Extensible Provisioning Protocol (EPP)

25.1 Introduction
Despegar Online SRL ("Despegar") back-end registry operator, Neustar, Inc.
("Neustar") has over 10 years of experience operating EPP-based registries. They
deployed one of the first EPP registries in 2001 with the launch of .BIZ. In 2004,
they were the first gTLD to implement EPP 1.0. Over the last ten years Neustar has
implemented numerous extensions to meet various unique TLD requirements. Neustar
will leverage its extensive experience to ensure Despegar is provided with an
unparalleled EPP-based registry. The following discussion explains the EPP
interface, which will be used for the .HOTEIS registry. This interface exists within
the protocol farm layer as described in Question 24 and is depicted in Figure 25-1.
See attachment: Figure 25-1. The protocol layer is responsible for ensuring
transactions comply with the appropriate protocol.
25.2 EPP Interface
Registrars are provided with two different interfaces for interacting with the
registry. Both are EPP-based, and both contain all the functionality necessary to
provision and manage domain names. The primary mechanism is an EPP interface to
connect directly with the registry. This is the interface registrars will use for
most of their interactions with the registry.
However, an alternative web GUI (Registry Administration Tool) that can also be used
to perform EPP transactions will be provided. The primary use of the Registry
Administration Tool is for performing administrative or customer support tasks.
The main features of the EPP implementation are:
Standards Compliance: The EPP XML interface is compliant to the EPP RFCs. As future
EPP RFCs are published or existing RFCs are updated, Neustar makes changes to the
implementation keeping in mind of any backward compatibility issues.
Scalability: The system is deployed keeping in mind that it may be required to grow
and shrink the footprint of the Registry system for a particular TLD.
Fault-tolerance: The EPP servers are deployed in two geographically separate data
centers to provide for quick failover capability in case of a major outage in a
particular data center. The EPP servers adhere to strict availability requirements
defined in the SLAs.

Configurability: The EPP extensions are built in a way that they can be easily configured to turn on or off for a particular TLD.
Extensibility: The software is built ground-up using object-oriented design. This allows for easy extensibility of the software without risking the possibility of the change rippling through the whole application.
Auditable: The system stores detailed information about EPP transactions from provisioning to DNS and WHOIS publishing. In case of a dispute regarding a name registration, the Registry can provide comprehensive audit information on EPP transactions.
Security: The system provides IP address-based access control, client credential-based authorization test, digital certificate exchange, and connection limiting to the protocol layer.
25.3 Compliance with RFCs and Specifications
The registry-registrar model is described and embodied in a number of IETF RFCs, ICANN contracts and practices, and registry-registrar agreements. As shown in Table 25-1, EPP is defined by the core set of RFCs that standardize the interface that registrars use to provision domains with the SRS. As a core component of the SRS architecture, the implementation is fully compliant with all EPP RFCs.
See attachment: Table 25-1.
Neustar ensures compliance with all RFCs through a variety of processes and procedures. Members from the engineering and standards teams actively monitor and participate in the development of RFCs that impact the registry services, including those related to EPP. When new RFCs are introduced or existing ones are updated, the team performs a full compliance review of each system impacted by the change. Furthermore, all code releases include a full regression test that includes specific test cases to verify RFC compliance.
Neustar has a long history of providing exceptional service that exceeds all performance specifications. The SRS and EPP interface have been designed to exceed the EPP specifications defined in Specification 10 of the Registry Agreement and profiled in Table 25-2. Evidence of Neustar's ability to perform at these levels can be found in the .biz monthly progress reports found on the ICANN website.
See attachment: Table 25-2.
EPP Toolkits
Toolkits, under open source licensing, are freely provided to registrars for interfacing with the SRS. Both Java and C++ toolkits will be provided, along with the accompanying documentation. The Registrar Tool Kit (RTK) is a software development kit (SDK) that supports the development of a registrar software system for registering domain names in the registry using EPP. The SDK consists of software and documentation as described below.
The software consists of working Java and C++ EPP common APIs and samples that implement the EPP core functions and EPP extensions used to communicate between the registry and registrar. The RTK illustrates how XML requests (registration events) can be assembled and forwarded to the registry for processing. The software provides the registrar with the basis for a reference implementation that conforms to the EPP registry-registrar protocol. The software component of the SDK also includes XML schema definition files for all Registry EPP objects and EPP object extensions. The RTK also includes a "dummy" server to aid in the testing of EPP clients.
The accompanying documentation describes the EPP software package hierarchy, the object data model, and the defined objects and methods (including calling parameter lists and expected response behavior). New versions of the RTK are made available from time to time to provide support for additional features as they become available and support for other platforms and languages.
25.3 Proprietary EPP Extensions
The .HOTEIS registry will not include proprietary EPP extensions. Neustar has implemented various EPP extensions for both internal and external use in other TLD registries. These extensions use the standard EPP extension framework described in RFC 5730. Table 25-3 provides a list of extensions developed for other TLDs. Should the .HOTEIS registry require an EPP extension at some point in the future, the extension will be implemented in compliance with all RFC specifications including RFC 3735.
See attachment: Table 25-3.
The full EPP schema to be used in the .HOTEIS registry is attached in the document titled "EPP Schema."
25.4 Resourcing Plans
The development and support of EPP is largely the responsibility of the Development∕ Engineering and Quality Assurance teams. As an experience registry operator with a fully developed EPP solution, on-going support is largely limited to periodic updates to the standard and the implementation of TLD specific extensions.
The necessary resources will be pulled from the pool of available resources

described in detail in the response to Question 31. The following resources are
available from those teams:
Development∕Engineering – 19 employees
Quality Assurance – 7 employees.
These resources are more than adequate to support any EPP modification needs of the
.HOTEIS registry.

26. Whois

26.1 Introduction
Despegar Online SRL ("Despegar") recognizes the importance of an accurate, reliable,
and up-to-date WHOIS database to governments, law enforcement, intellectual property
holders, and the public as a whole and is firmly committed to complying with all of
the applicable WHOIS specifications for data objects, bulk access, and lookups as
defined in Specifications 4 and 10 of the Registry Agreement. Despegar's back-end
registry services provider, Neustar, Inc. ("Neustar"), has extensive experience
providing ICANN and RFC-compliant WHOIS services for each of the TLDs that it
operates both as a Registry Operator for gTLDs and ccTLDs, and as a back-end
registry services provider. As one of the first "thick" Registry Operators in the
gTLD space, Neustar's WHOIS service has been designed from the ground up to display
as much information as required by a TLD and to respond to a very stringent
availability and performance requirement.
Some of the key features of .HOTEIS's solution include:
Fully compliant with all relevant RFCs including 3912;
Production proven, highly flexible, and scalable with a track record of 100%
availability over the past 10 years;
Exceeds current and proposed performance specifications;
Supports dynamic updates with the capability of doing bulk updates; and
Geographically distributed sites to provide greater stability and performance.
In addition, .HOTEIS's thick-WHOIS solution also provides for additional search
capabilities and mechanisms to mitigate potential forms of abuse as discussed below.
(e.g., IDN, registrant data).
26.2 Software Components
The WHOIS architecture comprises the following components:
An in-memory database local to each WHOIS node: To provide for the performance
needs, the WHOIS data is served from an in-memory database indexed by searchable
keys.
Redundant servers: To provide for redundancy, the WHOIS updates are propagated to a
cluster of WHOIS servers that maintain an independent copy of the database.
Attack resistant: To ensure that the WHOIS system cannot be abused using malicious
queries or DOS attacks, the WHOIS server is only allowed to query the local database
and rate limits on queries based on IPs and IP ranges can be readily applied.
Accuracy auditor: To ensure the accuracy of the information served by the WHOIS
servers, a daily audit is done between the SRS information and the WHOIS responses
for the domain names which are updated during the last 24-hour period. Any
discrepancies are resolved proactively.
Modular design: The WHOIS system allows for filtering and translation of data
elements between the SRS and the WHOIS database to allow for customizations.
Scalable architecture: The WHOIS system is scalable and has a very small footprint.
Depending on the query volume, the deployment size can grow and shrink quickly.
Flexible: It is flexible enough to accommodate thin, thick, or modified thick models
and can accommodate any future ICANN policy, such as different information display
levels based on user categorization.
SRS master database: The SRS database is the main persistent store of the registry
information. The Update Agent computes what WHOIS updates need to be pushed out. A
publish-subscribe mechanism then takes these incremental updates and pushes to all
the WHOIS slaves that answer queries.
26.3 Compliance with RFC and Specifications 4 and 10
Neustar has been running thick-WHOIS Services for over 10+ years in full compliance
with RFC 3912 and with Specifications 4 and 10 of the Registry Agreement. RFC 3912
is a simple text-based protocol over TCP that describes the interaction between the
server and client on port 43. Neustar built a home-grown solution for this service.
It processes millions of WHOIS queries per day.
See attachment: Table 26-1, which describes Neustar's compliance with Specifications

4 and 10.

Neustar ensures compliance with all RFCs through a variety of processes and procedures. Members from the engineering and standards teams actively monitor and participate in the development of RFCs that impact the registry services, including those related to WHOIS. When new RFCs are introduced or existing ones are updated, the team performs a full compliance review of each system impacted by the change. Furthermore, all code releases include a full regression test that includes specific test cases to verify RFC compliance.

26.4 High-level WHOIS System Description

26.4.1 WHOIS Service (port 43)

The WHOIS service is responsible for handling port 43 queries. Our WHOIS is optimized for speed using an in-memory database and master-slave architecture between the SRS and WHOIS slaves.

The WHOIS service also has built-in support for IDN. If the domain name being queried is an IDN, the returned results include the language of the domain name, the domain name's UTF-8 encoded representation along with the Unicode code page.

26.4.2 Web Page for WHOIS queries

In addition to the WHOIS Service on port 43, Neustar provides a Web-based WHOIS application (www.whois.tld). It is an intuitive and easy to use application for the general public to use. The WHOIS Web-application provides all of the features available in the port 43 WHOIS. This includes full and partial search on:

Domain names;

Nameservers;

Registrant, Technical, and Administrative Contacts; and

Registrars.

It also provides features not available on the port 43 service. These include:

Redemption Grace Period calculation: Based on the registry's policy, domains in pendingDelete can be restorable or scheduled for release depending on the date∕time the domain went into pendingDelete. For these domains, the Web-based WHOIS displays "Restorable" or "Scheduled for Release" to clearly show this additional status to the user.

Extensive support for international domain names (IDN);

Ability to perform WHOIS lookups on the actual Unicode IDN;

Display of the actual Unicode IDN in addition to the ACE-encoded name;

A Unicode to Punycode and Punycode to Unicode translator;

An extensive FAQ; and

A list of upcoming domain deletions.

26.5 IT and Infrastructure Resources

As described above, the WHOIS architecture uses a workflow that decouples the update process from the SRS. This ensures SRS performance is not adversely affected by the load requirements of dynamic updates. It is also decoupled from the WHOIS lookup agent to ensure the WHOIS service is always available and performing well for users. Each of Neustar's geographically diverse WHOIS sites use:

Firewalls, to protect this sensitive data;

Dedicated servers for MQ Series, to ensure guaranteed delivery of WHOIS updates;

Packetshaper for source IP address-based bandwidth limiting;

Load balancers to distribute query load; and

Multiple WHOIS servers for maximizing the performance of WHOIS service.

The WHOIS service uses HP BL 460C servers, each with 2 X Quad Core CPU and a 64GB of RAM. The existing infrastructure has 6 servers, but is designed to be easily scaled with additional servers should it be needed.

See attachment: Figure 26-1, which depicts the different components of the WHOIS architecture. WHOIS is decoupled from the architecture to protect production databases and increased overall systems security.

26.6 Interconnectivity with Other Registry System

As described in Question 24 about the SRS and further in response to Question 31, "Technical Overview," when an update is made by a registrar that impacts WHOIS data, a trigger is sent to the WHOIS system by the external notifier layer. The update agent processes these updates, transforms the data if necessary and then uses messaging-oriented middleware to publish all updates to each WHOIS slave. The local update agent accepts the update and applies it to the local in-memory database. A separate auditor compares the data in WHOIS and the SRS daily and monthly to ensure accuracy of the published data.

26.7 Frequency of Synchronization between Servers

Updates from the SRS, through the external notifiers, to the constellation of independent WHOIS slaves happens in real-time via an asynchronous publish∕subscribe messaging architecture. The updates are guaranteed to be updated in each slave within the required SLA of 95% ≤ 60 minutes. Please note that Neustar's current architecture is built towards the stricter SLAs (95% ≤ 15 minutes) of .BIZ. The vast

majority of updates tend to happen within 2-3 minutes.
26.8 Provision for Searchable WHOIS Capabilities
Neustar will create a new Web-based service to address the new search features based
on requirements specified in Specification 4 Section 1.8. The application will
enable users to search the WHOIS directory using any one or more of the following
fields:
Domain name;
Registrar ID;
Contact's and registrant's name;
Contact's and registrant's postal address, including all the sub-fields described in
EPP (e.g., street, city, state or province, etc.); and
Name server name and name server IP address
The system will also allow search using non-Latin character sets, which are
compliant with IDNA specification.
The user will choose one or more search criteria, combine them by Boolean operators
(AND, OR, NOT) and provide partial or exact match regular expressions for each of
the criterion name-value pairs. The domain names matching the search criteria will
be returned to the user.
See attachment: Figure 26-2, which shows an architectural depiction of the new
service. Neustar's Web-based service provides new search features based on
requirements specified in Specification 4 Section 1.8.
To mitigate the risk of this powerful search service being abused by unscrupulous
data miners, a layer of security will be built around the query engine, which will
allow the registry to identify rogue activities and then take appropriate measures.
Potential abuses include, but are not limited to:
Data Mining;
Unauthorized Access;
Excessive Querying; and
Denial of Service Attacks.
To mitigate the abuses noted above, Neustar will implement any or all of these
mechanisms as appropriate:
Username-password based authentication;
Certificate based authentication;
Data encryption;
CAPTCHA mechanism to prevent robo invocation of Web query; and
Fee-based advanced query capabilities for premium customers.
The searchable WHOIS application will adhere to all privacy laws and policies of the
.HOTEIS registry.
26.9 Resourcing Plans
As with the SRS, the development, customization, and on-going support of the WHOIS
service is the responsibility of a combination of technical and operational teams.
The primary groups responsible for managing the service include:
Development∕Engineering – 19 employees
Database Administration – 10 employees
Systems Administration – 24 employees
Network Engineering – 5 employees
Additionally, if customization or modifications are required, the Product Management
and Quality Assurance teams will also be involved. Finally, the Network Operations
and Information Security play an important role in ensuring the systems involved are
operating securely and reliably. The necessary resources will be pulled from the
pool of available resources described in detail in the response to Question 31.
Neustar's WHOIS implementation is very mature, and has been in production for over
10 years. As such, very little new development will be required to support the
implementation of the .HOTEIS registry. The resources are more than adequate to
support the WHOIS needs of all the TLDs operated by Neustar, including the .HOTEIS
registry.

27. Registration Life Cycle

27.1 Registration Life Cycle
Introduction
Despegar Online SRL ("Despegar") will follow the lifecycle and business rules found
in the majority of gTLDs today. Our back-end operator, Neustar, has over ten years
of experience managing numerous TLDs that utilize standard and unique business rules
and lifecycles. This section describes the business rules, registration states, and

the overall domain lifecycle that will be use for .HOTEIS.
Domain Lifecycle - Description
The registry will use the EPP 1.0 standard for provisioning domain names, contacts,
and hosts. Each domain record is comprised of three registry object types: domain,
contacts, and hosts.
Domains, contacts, and hosts may be assigned various EPP defined statuses indicating
either a particular state or restriction placed on the object. Some statuses may be
applied by the Registrar; other statuses may only be applied by the Registry.
Statuses are an integral part of the domain lifecycle and serve the dual purpose of
indicating the particular state of the domain and indicating any restrictions placed
on the domain. The EPP standard defines 17 statuses, however only 14 of these
statuses will be used in the .HOTEIS registry per the defined .HOTEIS business rules.
The following is a brief description of each of the statuses. Server statuses may
only be applied by the Registry, and client statuses may be applied by the Registrar.
OK - Default status applied by the Registry.
Inactive - Default status applied by the Registry if the domain has less than 2
nameservers.
PendingCreate - Status applied by the Registry upon processing a successful Create
command, and indicates further action is pending. This status will not be used in
the .HOTEIS registry.
PendingTransfer - Status applied by the Registry upon processing a successful
Transfer request command, and indicates further action is pending.
PendingDelete - Status applied by the Registry upon processing a successful Delete
command that does not result in the immediate deletion of the domain, and indicates
further action is pending.
PendingRenew - Status applied by the Registry upon processing a successful Renew
command that does not result in the immediate renewal of the domain, and indicates
further action is pending. This status will not be used in the .HOTEIS registry.
PendingUpdate - Status applied by the Registry if an additional action is expected
to complete the update, and indicates further action is pending. This status will
not be used in the .HOTEIS registry.
Hold - Removes the domain from the DNS zone.
UpdateProhibited - Prevents the object from being modified by an Update command.
TransferProhibited - Prevents the object from being transferred to another Registrar
by the Transfer command.
RenewProhibited - Prevents a domain from being renewed by a Renew command.
DeleteProhibited - Prevents the object from being deleted by a Delete command.
The lifecycle of a domain begins with the registration of the domain. All
registrations must follow the EPP standard, as well as the specific business rules
described in the response to Question 18 above. Upon registration a domain will
either be in an active or inactive state. Domains in an active state are delegated
and have their delegation information published to the zone. Inactive domains either
have no delegation information or their delegation information in not published in
the zone. Following the initial registration of a domain, one of five actions may
occur during its lifecycle:
Domain may be updated
Domain may be deleted, either within or after the add-grace period
Domain may be renewed at anytime during the term
Domain may be auto-renewed by the Registry
Domain may be transferred to another registrar.
Each of these actions may result in a change in domain state. This is described in
more detail in the following section. Every domain must eventually be renewed,
auto-renewed, transferred, or deleted. A registrar may apply EPP statuses described
above to prevent specific actions such as updates, renewals, transfers, or deletions.
27.1.1 Registration States
Domain Lifecycle - Registration States
As described above, the .HOTEIS registry will implement a standard domain lifecycle
found in most gTLD registries today. There are five possible domain states:
Active
Inactive
Locked
Pending Transfer
Pending Delete
All domains are always in either an Active or Inactive state, and throughout the
course of the lifecycle may also be in a Locked, Pending Transfer, and Pending
Delete state. Specific conditions such as applied EPP policies and registry business
rules will determine whether a domain can be transitioned between states.
Additionally, within each state, domains may be subject to various timed events such
as grace periods, and notification periods.

Active State
The active state is the normal state of a domain and indicates that delegation data
has been provided and the delegation information is published in the zone. A domain
in an Active state may also be in the Locked or Pending Transfer states.
Inactive State
The Inactive state indicates that a domain has not been delegated or that the
delegation data has not been published to the zone. A domain in an Inactive state
may also be in the Locked or Pending Transfer states. By default all domain in the
Pending Delete state are also in the Inactive state.
Locked State
The Locked state indicates that certain specified EPP transactions may not be
performed to the domain. A domain is considered to be in a Locked state if at least
one restriction has been placed on the domain; however up to eight restrictions may
be applied simultaneously. Domains in the Locked state will also be in the Active or
Inactive, and under certain conditions may also be in the Pending Transfer or
Pending Delete states.
Pending Transfer State
The Pending Transfer state indicates a condition in which there has been a request
to transfer the domain from one registrar to another. The domain is placed in the
Pending Transfer state for a period of time to allow the current (losing) registrar
to approve (ack) or reject (nack) the transfer request. Registrars may only nack
requests for reasons specified in the Inter-Registrar Transfer Policy.
Pending Delete State
The Pending Delete State occurs when a Delete command has been sent to the Registry
after the first 5 days (120 hours) of registration. The Pending Delete period is
35-days during which the first 30-days the name enters the Redemption Grace Period
(RGP) and the last 5-days guarantee that the domain will be purged from the Registry
Database and available to public pool for registration on a first come, first serve
basis.
27.1.2 Typical Registration Lifecycle Activities
Domain Creation Process
The creation (registration) of domain names is the fundamental registry operation.
All other operations are designed to support or complement a domain creation. The
following steps occur when a domain is created.
Contact objects are created in the SRS database. The same contact object may be used
for each contact type, or they may all be different. If the contacts already exist
in the database this step may be skipped.
Nameservers are created in the SRS database. Nameservers are not required to
complete the registration process; however any domain with less than 2 name servers
will not be resolvable.
The domain is created using the each of the objects created in the previous steps.
In addition, the term and any client statuses may be assigned at the time of
creation.
The actual number of EPP transactions needed to complete the registration of a
domain name can be as few as one and as many as 40. The latter assumes seven
distinct contacts and 13 nameservers, with Check and Create commands submitted for
each object.
Update Process
Registry objects may be updated (modified) using the EPP Modify operation. The
Update transaction updates the attributes of the object.
For example, the Update operation on a domain name will only allow the following
attributes to be updated:
Domain statuses
Registrant ID
Administrative Contact ID
Billing Contact ID
Technical Contact ID
Nameservers
AuthInfo
Additional Registrar provided fields
The Update operation will not modify the details of the contacts. Rather it may be
used to associate a different contact object (using the Contact ID) to the domain
name. To update the details of the contact object the Update transaction must be
applied to the contact itself. For example, if an existing registrant wished to
update the postal address, the Registrar would use the Update command to modify the
contact object, and not the domain object.
Renew Process
The term of a domain may be extended using the EPP Renew operation. ICANN policy
general establishes the maximum term of a domain name to be 10 years, and Neustar

recommends not deviating from this policy. A domain may be renewed⁄extended at any point time, even immediately following the initial registration. The only stipulation is that the overall term of the domain name may not exceed 10 years. If a Renew operation is performed with a term value will extend the domain beyond the 10-year limit, the Registry will reject the transaction entirely.
Transfer Process
The EPP Transfer command is used for several domain transfer related operations:
Initiate a domain transfer
Cancel a domain transfer
Approve a domain transfer
Reject a domain transfer
To transfer a domain from one Registrar to another the following process is followed:
The gaining (new) Registrar submits a Transfer command, which includes the AuthInfo code of the domain name.
If the AuthInfo code is valid and the domain is not in a status that does not allow transfers the domain is placed into PendingTransfer status
A poll message notifying the losing Registrar of the pending transfer is sent to the Registrar's message queue
The domain remains in PendingTransfer status for up to 120 hours, or until the losing (current) Registrar Acks (approves) or Nack (rejects) the transfer request
If the losing Registrar has not Acked or Nacked the transfer request within the 120 hour timeframe, the Registry auto-approves the transfer
The requesting Registrar may cancel the original request up until the transfer has been completed.
A transfer adds an additional year to the term of the domain. In the event that a transfer will cause the domain to exceed the 10-year maximum term, the Registry will add a partial term up to the 10 year limit. Unlike with the Renew operation, the Registry will not reject a transfer operation.
Deletion Process
A domain may be deleted from the SRS using the EPP Delete operation. The Delete operation will result in either the domain being immediately removed from the database or the domain being placed in PendingDelete status. The outcome is dependent on when the domain is deleted. If the domain is deleted within the first five days (120 hours) of registration, the domain is immediately removed from the database. A deletion at any other time will result in the domain being placed in PendingDelete status and entering the Redemption Grace Period (RGP). Additionally, domains that are deleted within five days (120) hours of any billable (add, renew, transfer) transaction may be deleted for credit.
27.1.3 Applicable Time Elements
The following section explains the time elements that are involved
Grace Periods
There are six grace periods:
Add-Delete Grace Period (AGP)
Renew-Delete Grace Period
Transfer-Delete Grace Period
Auto-Renew-Delete Grace Period
Auto-Renew Grace Period
Redemption Grace Period (RGP).
The first four grace periods listed above are designed to provide the Registrar with the ability to cancel a revenue transaction (add, renew, or transfer) within a certain period of time and receive a credit for the original transaction.
The following describes each of these grace periods in detail.
Add-Delete Grace Period
The APG is associated with the date the Domain was registered. Domains may be deleted for credit during the initial 120 hours of a registration, and the Registrar will receive a billing credit for the original registration. If the domain is deleted during the Add Grace Period, the domain is dropped from the database immediately and a credit is applied to the Registrar's billing account.
Renew-Delete Grace Period
The Renew-Delete Grace Period is associated with the date the Domain was renewed. Domains may be deleted for credit during the 120 hours after a renewal. The grace period is intended to allow Registrars to correct domains that were mistakenly renewed. It should be noted that domains that are deleted during the renew grace period will be placed into PendingDelete and will enter the RGP (see below).
Transfer-Delete Grace Period
The Transfer-Delete Grace Period is associated with the date the Domain was transferred to another Registrar. Domains may be deleted for credit during the 120 hours after a transfer. It should be noted that domains that are deleted during the renew grace period will be placed into PendingDelete and will enter the RGP. A

deletion of domain after a transfer is not the method used to correct a transfer mistake. Domains that have been erroneously transferred or hijacked by another party can be transferred back to the original registrar through various means including contacting the Registry.

Auto-Renew-Delete Grace Period

The Auto-Renew-Delete Grace Period is associated with the date the Domain was auto-renewed. Domains may be deleted for credit during the 120 hours after an auto-renewal. The grace period is intended to allow Registrars to correct domains that were mistakenly auto-renewed. It should be noted that domains that are deleted during the auto-renew delete grace period will be placed into PendingDelete and will enter the RGP.

Auto-Renew Grace Period

The Auto-Renew Grace Period is a special grace period intended to provide registrants with an extra amount of time, beyond the expiration date, to renew their domain name. The grace period lasts for 45 days from the expiration date of the domain name. Registrars are not required to provide registrants with the full 45 days of the period.

Redemption Grace Period

The RGP is a special grace period that enables Registrars to restore domains that have been inadvertently deleted but are still in PendingDelete status within the Redemption Grace Period. All domains enter the RGP except those deleted during the AGP.

The RGP period is 30 days, during which time the domain may be restored using the EPP RenewDomain command as described below. Following the 30day RGP period the domain will remain in PendingDelete status for an additional five days, during which time the domain may NOT be restored. The domain is released from the SRS, at the end of the 5-day non-restore period. A restore fee applies and is detailed in the Billing Section. A renewal fee will be automatically applied for any domain past expiration.

Neustar has created a unique restoration process that uses the EPP Renew transaction to restore the domain and fulfill all the reporting obligations required under ICANN policy. The following describes the restoration process.

27.2 State Diagram

See attachment: Figure 27-1, which provides a description of the registration lifecycle.

The different states of the lifecycle are active, inactive, locked, pending transfer, and pending delete. Please refer to section 27.1.1 for detail description of each of these states. The lines between the states represent triggers that transition a domain from one state to another.

The details of each trigger are described below:

Create: Registry receives a create domain EPP command.

WithNS: The domain has met the minimum number of nameservers required by registry policy in order to be published in the DNS zone.

WithOutNS: The domain has not met the minimum number of nameservers required by registry policy. The domain will not be in the DNS zone.

Remove Nameservers: Domain's nameserver(s) is removed as part of an update domain EPP command. The total nameserver is below the minimum number of nameservers required by registry policy in order to be published in the DNS zone.

Add Nameservers: Nameserver(s) has been added to domain as part of an update domain EPP command. The total number of nameservers has met the minimum number of nameservers required by registry policy in order to be published in the DNS zone.

Delete: Registry receives a delete domain EPP command.

DeleteAfterGrace: Domain deletion does not fall within the add grace period.

DeleteWithinAddGrace: Domain deletion falls within add grace period.

Restore: Domain is restored. Domain goes back to its original state prior to the delete command.

Transfer: Transfer request EPP command is received.

Transfer Approve∕Cancel∕Reject: Transfer requested is approved or cancel or rejected.

TransferProhibited: The domain is in clientTransferProhibited and∕or serverTranferProhibited status. This will cause the transfer request to fail. The domain goes back to its original state.

DeleteProhibited: The domain is in clientDeleteProhibited and∕or serverDeleteProhibited status. This will cause the delete command to fail. The domain goes back to its original state.

Note: the locked state is not represented as a distinct state on the diagram as a domain may be in a locked state in combination with any of the other states: inactive, active, pending transfer, or pending delete.

27.2.1 EPP RFC Consistency

As described above, the domain lifecycle is determined by ICANN policy and the EPP

RFCs. Neustar has been operating ICANN TLDs for the past 10 years consistent and
compliant with all the ICANN policies and related EPP RFCs.
27.3 Resources
The registration lifecycle and associated business rules are largely determined by
policy and business requirements; as such the Product Management and Policy teams
will play a critical role in working with Despegar to determine the precise rules
that meet the requirements of the TLD. Implementation of the lifecycle rules will be
the responsibility of Development∕Engineering team, with testing performed by the
Quality Assurance team. Neustar's SRS implementation is very flexible and
configurable, and in many case development is not required to support business rule
changes.
The .HOTEIS registry will be using standard lifecycle rules, and as such no
customization is anticipated. However should modifications be required in the
future, the necessary resources will be pulled from the pool of available resources
described in detail in the response to Question 31. The following resources are
available from those teams:
Development∕Engineering – 19 employees
Registry Product Management – 4 employees
These resources are more than adequate to support the development needs of all the
TLDs operated by Neustar, including the .HOTEIS registry.

28. Abuse Prevention and Mitigation

28.1 Abuse Prevention and Mitigation
Strong abuse prevention of a new gTLD is an important benefit to the Internet
community. Despegar Online SRL ("Despegar") and its back-end registry services
provider, Neustar, Inc. ("Neustar"), agree that a registry must not only aim for the
highest standards of technical and operational competence, but also needs to act as
a steward of the space on behalf of the Internet community and ICANN in promoting
the public interest. Neustar brings extensive experience establishing and
implementing registration policies. This experience will be leveraged to help
Despegar combat abusive and malicious domain activity within the new gTLD space.
One of those public interest functions for a responsible domain name registry
includes working towards the eradication of abusive domain name registrations,
including, but not limited to, those resulting from:
Illegal or fraudulent actions
Spam
Phishing
Pharming
Distribution of malware
Fast flux hosting
Botnets
Distribution of child pornography
Online sale or distribution of illegal pharmaceuticals
More specifically, although traditionally botnets have used Internet Relay Chat
(IRC) servers to control registry and the compromised PCs, or bots, for DDoS attacks
and the theft of personal information, an increasingly popular technique, known as
fast-flux DNS, allows botnets to use a multitude of servers to hide a key host or to
create a highly-available control network. This ability to shift the attacker's
infrastructure over a multitude of servers in various countries creates an obstacle
for law enforcement and security researchers to mitigate the effects of these
botnets. But a point of weakness in this scheme is its dependence on DNS for its
translation services. By taking an active role in researching and monitoring these
sorts of botnets, Despegar's partner, Neustar, has developed the ability to
efficiently work with various law enforcement and security communities to begin a
new phase of mitigation of these types of threats.
Policies and Procedures to Minimize Abusive Registrations
A registry must have the policies, resources, personnel, and expertise in place to
combat such abusive DNS practices. As Despegar's registry provider, Neustar is at
the forefront of the prevention of such abusive practices and is one of the few
registry operators to have actually developed and implemented an active "domain
takedown" policy. We also believe that a strong program is essential given that
registrants have a reasonable expectation that they are in control of the data
associated with their domains, especially its presence in the DNS zone. Because
domain names are sometimes used as a mechanism to enable various illegitimate

activities on the Internet, often the best preventative measure to thwart these attacks is to remove the names completely from the DNS before they can impart harm, not only to the domain name registrant, but also to millions of unsuspecting Internet users.

Removing the domain name from the zone has the effect of shutting down all activity associated with the domain name, including the use of all websites and e-mail. The use of this technique should not be entered into lightly. Despegar has an extensive, defined, and documented process for taking the necessary action of removing a domain from the zone when its presence in the zone poses a threat to the security and stability of the infrastructure of the Internet or the registry.

Abuse Point of Contact

As required by the Registry Agreement, Despegar will establish and publish on its website a single abuse point of contact responsible for addressing inquiries from law enforcement and the public related to malicious and abusive conduct. Despegar will also provide such information to ICANN prior to the delegation of any domain names in the TLD. This information shall consist of, at a minimum, a valid e-mail address dedicated solely to the handling of malicious conduct complaints, and a telephone number and mailing address for the primary contact. We will ensure that this information will be kept accurate and up-to-date and will be provided to ICANN if and when changes are made. In addition, with respect to inquiries from ICANN-Accredited registrars, our registry services provider, Neustar, shall have an additional point of contact, as it does today, handling requests by registrars related to abusive domain name practices.

28.2 Policies Regarding Abuse Complaints

One of the key policies each new gTLD registry will need to have is an Acceptable Use Policy that clearly delineates the types of activities that constitute "abuse" and the repercussions associated with an abusive domain name registration. In addition, the policy will be incorporated into the applicable Registry-Registrar Agreement and reserve the right for the registry to take the appropriate actions based on the type of abuse. This will include locking down the domain name, preventing any changes to the contact and nameserver information associated with the domain name, placing the domain name "on hold," rendering the domain name non-resolvable, transferring to the domain name to another registrar, and⁄or in cases in which the domain name is associated with an existing law enforcement investigation, substituting name servers to collect information about the DNS queries to assist the investigation.

Despegar will adopt an Acceptable Use Policy that clearly defines the types of activities that will not be permitted in the TLD and reserves the right to lock, cancel, transfer, or otherwise suspend or take down domain names violating the Acceptable Use Policy and allow the registry where and when appropriate to share information with law enforcement. Each ICANN-Accredited Registrar must agree to pass through the Acceptable Use Policy to its Resellers (if applicable) and ultimately to the TLD registrants. Below is the registry's initial Acceptable Use Policy that we will use in connection with the .HOTEIS TLD.

.HOTEIS Acceptable Use Policy

This Acceptable Use Policy gives the registry the ability to quickly lock, cancel, transfer, or take ownership of any .HOTEIS domain name, either temporarily or permanently, if the domain name is being used in a manner that appears to threaten the stability, integrity, or security of the registry, or any of its registrar partners – and⁄or that may put the safety and security of any registrant or user at risk. The process also allows the registry to take preventive measures to avoid any such criminal or security threats.

The Acceptable Use Policy may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the ongoing monitoring by the registry or its partners. In all cases, the registry or its designees will alert registry's registrar partners about any identified threats, and will work closely with them to bring offending sites into compliance.

The following are some (but not all) activities that may be subject to rapid domain compliance:

Phishing: the attempt to acquire personally identifiable information by masquerading as a website other than .HOTEIS' own.

Pharming: the redirection of Internet users to websites other than those the user intends to visit, usually through unauthorized changes to the Hosts file on a victim's computer or DNS records in DNS servers.

Dissemination of Malware: the intentional creation and distribution of "malicious" software designed to infiltrate a computer system without the owner's consent, including, without limitation, computer viruses, worms, key loggers, and Trojans.

Fast Flux Hosting: a technique used to shelter Phishing, Pharming, and Malware sites

and networks from detection and to frustrate methods employed to defend against such practices, whereby the IP address associated with fraudulent websites are changed rapidly so as to make the true location of the sites difficult to find.
Botnetting: the development and use of a command, agent, motor, service, or software which is implemented: (1) to remotely control the computer or computer system of an Internet user without their knowledge or consent, (2) to generate direct denial of service (DDOS) attacks.
Malicious Hacking: the attempt to gain unauthorized access (or exceed the level of authorized access) to a computer, information system, user account or profile, database, or security system.
Child Pornography: the storage, publication, display, and/or dissemination of pornographic materials depicting individuals under the age of majority in the relevant jurisdiction.
The registry reserves the right, in its sole discretion, to take any administrative and operational actions necessary, including the use of computer forensics and information security technological services, among other things, in order to implement the Acceptable Use Policy. In addition, the registry reserves the right to deny, cancel, or transfer any registration or transaction, or place any domain name(s) on registry lock, hold, or similar status, that it deems necessary, in its discretion; (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of the registry as well as its affiliates, subsidiaries, officers, directors, and employees; (4) per the terms of the registration agreement or (5) to correct mistakes made by the registry or any registrar in connection with a domain name registration. The registry also reserves the right to place upon registry lock, hold, or similar status a domain name during resolution of a dispute.
Taking Action Against Abusive and/or Malicious Activity
The registry is committed to ensuring that those domain names associated with abuse or malicious conduct in violation of the Acceptable Use Policy are dealt with in a timely and decisive manner. These include taking action against those domain names that are being used to threaten the stability and security of the TLD, or are part of a real-time investigation by law enforcement.
Once a complaint is received from a trusted source, third party, or detected by the registry, the registry will use commercially reasonable efforts to verify the information in the complaint. If that information can be verified to the best of the ability of the registry, the sponsoring registrar will be notified and be given 12 hours to investigate the activity and either take down the domain name by placing the domain name on hold or by deleting the domain name in its entirety, or providing a compelling argument to the registry to keep the name in the zone. If the registrar has not taken the requested action after the 12-hour period (i.e., is unresponsive to the request or refuses to take action), the registry will place the domain on "ServerHold." Although this action removes the domain name from the TLD zone, the domain name record still appears in the TLD WHOIS database so that the name and entities can be investigated by law enforcement should they desire to get involved.
Coordination with Law Enforcement
With the assistance of Neustar as its back-end registry services provider, Despegar can meet its obligations under Section 2.8 of the Registry Agreement where required to take reasonable steps to investigate and respond to reports from law enforcement and governmental and quasi-governmental agencies of illegal conduct in connection with the use of its TLD. The registry will respond to legitimate law enforcement inquiries within one business day from receiving the request. Such response shall include, at a minimum, an acknowledgement of receipt of the request, questions or comments concerning the request, and an outline of the next steps to be taken by Despegar for rapid resolution of the request.
In the event such request involves any of the activities which can be validated by the registry and involves the type of activity set forth in the Acceptable Use Policy, the sponsoring registrar is then given 12 hours to investigate the activity further and either take down the domain name by placing the domain name on hold or by deleting the domain name in its entirety, or providing a compelling argument to the registry to keep the name in the zone. If the registrar has not taken the requested action after the 12-hour period (i.e., is unresponsive to the request or refuses to take action), the registry will place the domain on "serverHold."
28.2 Measures for Removal of Orphan Glue Records
As the Security and Stability Advisory Committee of ICANN (SSAC) rightly acknowledges, although orphaned glue records may be used for abusive or malicious purposes, the "dominant use of orphaned glue supports the correct and ordinary operation of the DNS." See http://www.icann.org/en/committees/security/sac048.pdf. While orphan glue often support correct and ordinary operation of the DNS, we

understand that such glue records can be used maliciously to point to name servers that host domains used in illegal phishing, botnets, malware, and other abusive behaviors. Problems occur when the parent domain of the glue record is deleted but its children glue records still remain in DNS. Therefore, when the registry has written evidence of actual abuse of orphaned glue, the registry will take action to remove those records from the zone to mitigate such malicious conduct.
Neustar runs a daily audit of entries in its DNS systems and compares those with its provisioning system. This serves as an umbrella protection to make sure that items in the DNS zone are valid. Any DNS record that shows up in the DNS zone but not in the provisioning system will be flagged for investigation and removed if necessary. This daily DNS audit serves to not only prevent orphaned hosts but also other records that should not be in the zone.
In addition, if either Despegar or Neustar becomes aware of actual abuse on orphaned glue after receiving written notification by a third party through its Abuse Contact or through its customer support, such glue records will be removed from the zone.
28.3 Measures to Promote WHOIS Accuracy
Despegar acknowledges that ICANN has developed a number of mechanisms over the past decade that are intended to address the issue of inaccurate WHOIS information. However, the proposed use of .HOTEIS as a gTLD in which all of the domain names will initially be registered by Despegar and its qualified subsidiaries and affiliates essentially eliminates the potential of false or inaccurate WHOIS data. Further ensuring that all domain names contain uniform, accurate, and up-to-date WHOIS information is the fact that these domain names will be registered through Despegar's existing registrar(s), or a similarly situated registrar, which handle Despegar's existing domain name portfolio.
Should Despegar expand the universe of potential registrants in the .HOTEIS namespace, to include third parties such as licensees or strategic partners, Despegar intends to offer the following enhanced mechanism to ensure the accuracy of WHOIS data, specifically, a mechanism whereby third parties can submit complaints directly to Despegar (as opposed to ICANN or the sponsoring registrar) about inaccurate or incomplete WHOIS data. Such information shall be forwarded to the sponsoring registrar, who shall be required to address those complaints with their registrants. Thirty days after forwarding the complaint to the registrar, Despegar will examine the current WHOIS data for names that were alleged to be inaccurate to determine if the information was corrected, the domain name was deleted, or there was some other disposition. If the registrar has failed to take any action, or it is clear that the registrant was either unwilling or unable to correct the inaccuracies, Despegar reserves the right to suspend the applicable domain name(s) until such time as the registrant is able to cure the deficiencies.
In addition, should Despegar expand the universe of potential registrants within the .HOTEIS namespace to include third parties such as licensees or strategic partners, Despegar shall on its own initiative, no less than twice per year, perform a manual review of a random sampling of .HOTEIS domain names to test the accuracy of the WHOIS information. Although this will not include verifying the actual information in the WHOIS record, Despegar will be examining the WHOIS data for prima facie evidence of inaccuracies. In the event that such evidence exists, it shall be forwarded to the sponsoring registrar, who shall be required to address those complaints with its registrants. Thirty days after forwarding the complaint to the registrar, the Despegar will examine the current WHOIS data for names that were alleged to be inaccurate to determine if the information was corrected, the domain name was deleted, or there was some other disposition. If the registrar has failed to take any action, or it is clear that the registrant was either unwilling or unable to correct the inaccuracies, Despegar reserves the right to suspend the applicable domain name(s) until such time as the registrant is able to cure the deficiencies.
28.3.1 Authentication of Registrant Information
As noted above, the proposed use of the .HOTEIS as a .BRAND gTLD in which all domain names will initially be registered by Despegar to Despegar, or its qualified subsidiaries and affiliates, essentially eliminates the potential of false or inaccurate WHOIS data. Additionally, all domain names will be registered through Despegar's corporate registrar, or a similar corporate registrar, which employs enhanced security protocols that limit which employees can register domain names, as well as ensure that those domain names that are registered contain uniform, accurate, and up-to-date WHOIS information.
Should Despegar expand the universe of potential registrants within the .HOTEIS namespace to include third parties such as licensees or strategic partners, such domain names would not be permitted to be registered until Despegar had a process in place to verify the identity of the registrant and the accuracy of the WHOIS data.
28.3.2 Monitoring of Registration Data

 As noted above Despegar will provide a mechanism by which third parties can submit a WHOIS accuracy complaint directly to the Registry Operator for timely investigation and resolution. In addition, Despegar has committed to perform a manual review of a random sampling of .HOTEIS domain names no less than twice per year to test the accuracy of the WHOIS information after the expanding the potential universe of domain names to include third parties such as licensees or strategic partners.
28.3.3 Policies and Procedures Ensuring Compliance
These proposed enhanced safeguards designed to promote the accuracy of WHOIS data will be hard coded into the Registry-Registrar Agreement (RRA) as well as the end-registrant agreement. Despegar will proactively be monitoring similar gTLDs to ensure best in class policies to promote the accuracy and availability of WHOIS data.
28.4 Resourcing Plans
Responsibility for abuse mitigation rests with a variety of functional groups. The Abuse Monitoring team is primarily responsible for providing analysis and conducting investigations of reports of abuse. The customer service team also plays an important role in assisting with the investigations, responded to customers, and notifying registrars of abusive domains. Finally, the Policy∕Legal team is responsible for developing the relevant policies and procedures.
The necessary resources will be pulled from the pool of available resources described in detail in the response to Question 31. The following resources are available from those teams:
Customer Support – 12 employees
Policy∕Legal – 2 employees
In addition to the above staffing provided by Neustar, Despegar will provide the full support of its internal staff (2.0 FTE count) as well as its external vendors where the situation requires the extra staffing resources.
The resources are more than adequate to support the abuse mitigation procedures of the .HOTEIS registry.

29. Rights Protection Mechanisms

29.1. Rights Protection Mechanisms
Despegar Online SRL ("Despegar") is firmly committed to the protection of intellectual property rights and to implementing the mandatory rights protection mechanisms contained in the Applicant Guidebook and detailed in Specification 7 of the Registry Agreement. Despegar recognizes that although the New gTLD Program includes significant protections beyond those that were mandatory for a number of the current TLDs, a key motivator for Despegar's selection of Neustar, Inc. ("Neustar") as its registry services provider is Neustar's experience in successfully launching a number of TLDs with diverse rights protection mechanisms, including many of the ones required in the Applicant Guidebook. More specifically, Despegar will implement the following rights protection mechanisms in accordance with the Applicant Guidebook as further described below:
Trademark Clearinghouse: a one-stop shop so that trademark holders can protect their trademarks with a single registration;
Sunrise and Trademark Claims processes for the TLD;
Implementation of the Uniform Domain Name Dispute Resolution Policy to address domain names that have been registered and used in bad faith in the TLD;
Uniform Rapid Suspension: A quicker, more efficient, and cheaper alternative to the Uniform Domain Name Dispute Resolution Policy to deal with clear cut cases of cybersquatting;
Implementation of a thick WHOIS, making it easier for rights holders to identify and locate infringing parties.
A.   Trademark Clearinghouse Including Sunrise and Trademark Claims
The first mandatory rights protection mechanism ("RPM") required to be implemented by each new gTLD registry is support for, and interaction with, the Trademark Clearinghouse. The Trademark Clearinghouse is intended to serve as a central repository for information to be authenticated, stored, and disseminated pertaining to the rights of trademark holders. The data maintained in the Clearinghouse will support and facilitate other RPMs, including the mandatory Sunrise Period and Trademark Claims service. Although many of the details of how the Trademark Clearinghouse will interact with each registry operator and registrars, Despegar is actively monitoring the developments of the Implementation Assistance Group ("IAG") designed to assist ICANN staff in firming up the rules and procedures associated with the policies and technical requirements for the Trademark Clearinghouse. In

addition, Despegar's back-end registry services provider is actively participating in the IAG to ensure that the protections afforded by the Clearinghouse and associated RPMs are feasible and implementable.

Utilizing the Trademark Clearinghouse, all operators of new gTLDs must offer: (i) a Sunrise registration service for at least 30 days during the pre-launch phase, giving eligible trademark owners an early opportunity to register second-level domains in new gTLDs; and (ii) a Trademark Claims service for at least the first 60 days that second-level registrations are open. The trademark claim service is intended to provide clear notice" to a potential registrant of the rights of a trademark owner whose trademark is registered in the clearinghouse.

Despegar's registry service provider, Neustar, has already implemented Sunrise and∕or Trademark Claims programs for numerous TLDs including .BIZ, .US, .TRAVEL, .TEL, and .CO and will implement the both of these services on behalf of .HOTEIS.

Neustar's Experience in Implementing Sunrise and Trademark Claims Processes

In early 2002, Neustar became the first registry operator to launch a successful authenticated Sunrise process. This process permitted qualified trademark owners to pre-register their trademarks as domain names in the .US ccTLD space prior to the opening of the space to the general public. Unlike any other "Sunrise" plans implemented (or proposed before that time), Neustar validated the authenticity of trademark applications and registrations with the United States Patent and Trademark Office (USPTO).

Subsequently, as the back-end registry operator for the .TEL gTLD and the .CO ccTLD, Neustar launched validated Sunrise programs employing processes. These programs are very similar to those that are to be employed by the Trademark Clearinghouse for new gTLDs.

Below is a high-level overview of the implementation of the .CO Sunrise period that demonstrates Neustar's experience and ability to provide a Sunrise service, and an overview of Neustar's experience in implementing a Trademark Claims program to trademark owners for the launch of .BIZ. Neustar's experience in each of these rights protection mechanisms will enable it to seamlessly provide these services on behalf of Despegar as required by ICANN.

Sunrise and .CO

The Sunrise process for .co was divided into two sub-phases:

Local Sunrise giving holders of eligible trademarks that have obtained registered status from the Colombian trademark office the opportunity apply for the .CO domain names corresponding with their marks; and

Global Sunrise program giving holders of eligible registered trademarks of national effect that have obtained a registered status in any country of the world the opportunity apply for the .CO domain names corresponding with their marks for a period of time before registration is open to the public at large.

Like the new gTLD process set forth in the Applicant Guidebook, trademark owners had to have their rights validated by a Clearinghouse provider prior to the registration being accepted by the registry. The Clearinghouse used a defined process for checking the eligibility of the legal rights claimed as the basis of each Sunrise application, using official national trademark databases and submitted documentary evidence.

Applicants and∕or their designated agents had the option of interacting directly with the Clearinghouse to ensure their applications were accurate and complete prior to submitting them to the registry pursuant to an optional "Pre-validation Process." Whether or not an applicant was "pre-validated," the applicant had to submit its corresponding domain name application through an accredited registrar. When the Applicant was pre-validated through the Clearinghouse, each was given an associated approval number that it had to supply to the registry. If they were not pre-validated, applicants were required to submit the required trademark information through their registrar to the registry.

At the registry level, Neustar subsequently either delivered the approval number and domain name registration information to the Clearinghouse, or in cases where there was no approval number, trademark information and the domain name registration information that was provided to the Clearinghouse through EPP (as is currently required under the Applicant Guidebook).

Information was then used by the Clearinghouse as either further validation of those pre-validated applications, or initial validation of those that did not go through pre-validation. If the applicant was validated and its trademark matched the domain name applied for, the Clearinghouse communicated that fact to the Registry via EPP. When there was only one validated Sunrise application, the application proceeded to registration when .CO launched. If there were multiple validated applications (recognizing that there could be multiple trademark owners sharing the same trademark), those were included in the .CO Sunrise auction process. Neustar tracked all of the information it received and the status of each application and posted

that status on a secure website to enable trademark owners to view the status of their Sunrise application.

Although the exact process for the Sunrise program and its interaction between the trademark owner, registry, registrar, and IP Clearinghouse is not completely defined in the Applicant Guidebook and is dependent on the current RFI issued by ICANN in its selection of a Trademark Clearinghouse provider, Neustar's expertise in launching multiple Sunrise processes and its established software will implement a smooth and compliant Sunrise process for the new gTLDs.

Trademark Claims Service Experience

With Neustar's .BIZ TLD launched in 2001, Neustar became the first registry with a Trademark Claims service. Neustar developed the Trademark Claims Service by enabling companies to stake claims to domain names prior to the commencement of live .BIZ domain registrations.

During the Trademark Claims process, Neustar received over 80,000 Trademark Claims from entities around the world. Recognizing that multiple intellectual property owners could have trademark rights in a particular mark, multiple Trademark Claims for the same string were accepted. All applications were logged into a Trademark Claims database managed by Neustar.

The Trademark Claimant was required to provide various information about their trademark rights, including the:

Particular trademark or service mark relied on for the trademark Claim;

Date a trademark application on the mark was filed, if any, on the string of the domain name;

Country where the mark was filed, if applicable;

Registration date, if applicable;

Class or classes of goods and services for which the trademark or service mark was registered;

Name of a contact person with whom to discuss the claimed trademark rights.

Once all Trademark Claims and domain name applications were collected, Neustar then compared the claims contained within the Trademark Claims database with its database of collected domain name applications (DNAs). In the event of a match between a Trademark Claim and a domain name application, an e-mail message was sent to the domain name applicant notifying the applicant of the existing Trademark Claim. The e-mail also stressed that if the applicant chose to continue the application process and was ultimately selected as the registrant, the applicant would be subject to Neustar's dispute proceedings if challenged by the Trademark Claimant for that particular domain name.

The domain name applicant had the option to proceed with the application or cancel the application. Proceeding on an application meant that the applicant wanted to go forward and have the application proceed to registration despite having been notified of an existing Trademark Claim. By choosing to "cancel," the applicant made a decision in light of an existing Trademark Claim notification to not proceed.

If the applicant did not respond to the e-mail notification from Neustar, or elected to cancel the application, the application was not processed. This resulted in making the applicant ineligible to register the actual domain name. If the applicant affirmatively elected to continue the application process after being notified of the Claimant's (or Claimants') alleged trademark rights to the desired domain name, Neustar processed the application.

This process is very similar to the one ultimately adopted by ICANN and incorporated in the latest version of the Applicant Guidebook. Although the collection of Trademark Claims for new gTLDs will be by the Trademark Clearinghouse, many of the aspects of Neustar's Trademark Claims process in 2001 are similar to those in the Applicant Guidebook. This makes Neustar uniquely qualified to implement the new gTLD Trademark Claims process.

B.   Uniform Domain Name Dispute Resolution Policy (UDRP) and Uniform Rapid Suspension (URS)

1.   UDRP

Prior to joining Neustar, Mr. Neuman was a key contributor to the development of the Uniform Domain Name Dispute Resolution Policy ("UDRP") in 1998. This became the first "Consensus Policy" of ICANN and has been required to be implemented by all domain name registries since that time. The UDRP is intended as an alternative dispute resolution process to transfer domain names from those that have registered and used domain names in bad faith. Although there is not much of an active role that the domain name registry plays in the implementation of the UDRP, Neustar has closely monitored UDRP decisions that have involved the TLDs that it supports and ensures that the decisions are implemented by the registrars supporting its TLDs. When alerted by trademark owners of failures to implement UDRP decisions by its registrars, Neustar either proactively implements the decisions itself or reminds

the offending registrar of its obligations to implement the decision.
URS
In response to complaints by trademark owners that the UDRP was too cost prohibitive
and slow, and the fact that more than 70 percent of UDRP cases were "clear cut"
cases of cybersquatting, ICANN adopted the IRT's recommendation that all new gTLD
registries be required, pursuant to their contracts with ICANN, to take part in a
Uniform Rapid Suspension system ("URS"). The purpose of the URS is to provide a more
cost effective and timely mechanism for brand owners than the UDRP to protect their
trademarks and to promote consumer protection on the Internet.
The URS is not meant to address questionable cases of alleged infringement (e.g.,
use of terms in a generic sense), for anti-competitive purposes, or denial of free
speech, but rather for those cases in which there is no genuine contestable issue as
to the infringement and abuse that is taking place.
Unlike the UDRP, which requires little involvement of gTLD registries, the URS
envisages much more of an active role at the registry level. For example, rather
than requiring the registrar to lock down a domain name subject to a UDRP dispute,
it is the registry under the URS that must lock the domain within 24 hours of
receipt of the complaint from the URS Provider to restrict all changes to the
registration data, including transfer and deletion of the domain names.
In addition, in the event of a determination in favor of the complainant, the
registry is required to suspend the domain name. This suspension remains for the
balance of the registration period and would not resolve the original website.
Rather, the nameservers would be redirected to an informational web page provided by
the URS Provider about the URS.
Additionally, the WHOIS reflects that the domain name will not be able to be
transferred, deleted, or modified for the life of the registration. Finally, there
is an option for a successful complainant to extend the registration period for one
additional year at commercial rates.
 Applicant is fully aware of each of these requirements and will have the
capability to implement these requirements for new gTLDs. In fact, during the IRT's
development of the URS, Neustar began examining the implications of the URS on its
registry operations and provided the IRT with feedback on whether the
recommendations from the IRT would be feasible for registries to implement.
Although there have been a few changes to the URS since the IRT recommendations,
Neustar continued to participate in the development of the URS by providing comments
to ICANN, many of which were adopted. As a result, Neustar is committed to
supporting the URS for all of the registries to which it provides back-end registry
services.
C.   Implementation of Thick WHOIS
The .HOTEIS registry will include a thick WHOIS database as required in
Specification 4 of the Registry Agreement. A thick WHOIS provides numerous
advantages, including a centralized location of registrant information, the ability
to more easily manage and control the accuracy of data, and a consistent user
experience.
D.   Policies Handling Complaints Regarding Abuse
In addition the rights protection mechanisms addressed above, Despegar will
implement a number of measures to handle complaints regarding the abusive
registration of domain names in its gTLD as described in its response to Question 28.
Registry Acceptable Use Policy
One of the key policies each new gTLD registry needs to have is an Acceptable Use
Policy that clearly delineates the types of activities that constitute "abuse" and
the repercussions associated with an abusive domain name registration. The policy
must be incorporated into the applicable Registry-Registrar Agreement and reserve
the right for the registry to take the appropriate actions based on the type of
abuse. This may include locking down the domain name, preventing any changes to the
contact and nameserver information associated with the domain name, placing the
domain name "on hold," rendering the domain name non-resolvable, transferring to the
domain name to another registrar, and⁄or in cases in which the domain name is
associated with an existing law enforcement investigation, substituting nameservers
to collect information about the DNS queries to assist the investigation. .HOTEIS'
Acceptable Use Policy, set forth in our response to Question 28, will include
prohibitions on phishing, pharming, dissemination of malware, fast flux hosting,
hacking, and child pornography. In addition, the policy will include the right of
the registry to take action necessary to deny, cancel, suspend, lock, or transfer
any registration in violation of the policy.
Monitoring for Malicious Activity
Despegar is committed to ensuring that those domain names associated with abuse or
malicious conduct in violation of the Acceptable Use Policy are dealt with in a
timely and decisive manner. These include taking action against those domain names

that are being used to threaten the stability and security of the gTLD, or is part of a real-time investigation by law enforcement.
Once a complaint is received from a trusted source, third party, or detected by the registry, the registry will use commercially reasonable efforts to verify the information in the complaint. If that information can be verified to the best of the ability of the registry, the sponsoring registrar will be notified and be given 12 hours to investigate the activity and either take down the domain name by placing the domain name on hold or by deleting the domain name in its entirety, or providing a compelling argument to the registry to keep the name in the zone. If the registrar has not taken the requested action after the 12-hour period (i.e., is unresponsive to the request or refuses to take action), the registry will place the domain on "ServerHold." Although this action removes the domain name from the gTLD zone, the domain name record still appears in the gTLD WHOIS database so that the name and entities can be investigated by law enforcement should they desire to get involved.
29.2 Safeguards against Unqualified Registrations
[FOR CORPORATE APPLICANTS]
As set forth in Despegar's response to Question 28, the proposed use of .HOTEIS as a gTLD is one in which all of the domain names will initially be registered by Despegar and its qualified subsidiaries and affiliates, thus eliminating the potential of unqualified registrations. Further ensuring that all domain names are only registered by qualified registrants is the fact that these domain names will be registered through Despegar's existing corporate registrar(s), or a similar corporate registrar, which handle(s) Despegar's existing domain name portfolio. Should Despegar expand the universe of potential registrants in the .HOTEIS namespace to include third parties such as licensees and∕or strategic partners, Despegar intends to offer the following enhanced mechanism to ensure that only qualified registrants have registered in the name space: specifically, a mechanism whereby third parties can submit complaints directly to Despegar (as opposed to ICANN or the sponsoring registrar) about the qualification of a domain name registrant in the .HOTEIS namespace. Despegar will then undertake an investigation to either confirm or dismiss the allegation. Despegar reserves the right to suspend the applicable domain name(s) until such time as the Registrant is able to resolve any qualification requirements.
If this mechanism, coupled with verification requirements imposed at the registrar level, prove inadequate, Despegar would evaluate implementing an annual sampling of the active zone file to verify registrant qualification as well as WHOIS accuracy. The size of the sampling would be based upon a meaningful statistical universe and would be subject to change based upon the results of this survey.
29.3 Resourcing Plans
The rights protection mechanisms described in the response above involve a wide range of tasks, procedures, and systems. The responsibility for each mechanism varies based on the specific requirements. In general, the development of applications such as Sunrise and IP claims is the responsibility of the Engineering team, with guidance from the Product Management team. Customer Support and Legal play a critical role in enforcing certain policies such as the rapid suspension process. These teams have years of experience implementing these or similar processes.
The necessary resources will be pulled from the pool of available resources described in detail in the response to Question 31. The following resources are available from those teams:
Development∕Engineering – 19 employees;
Product Management – four employees;
Customer Support – 12 employees.
Despegar's (2.0 FTE) allocated to registry oversight and compliance should have no problem undertaking these initial functions based upon the closed nature of the registry and the limited zone files size. However, if the number of domain names were to exceed a manageable size, Despegar would consider outsourcing this potential function to a qualified third party that could recognize more efficiencies and economies of scale in implementing these additional safeguard mechanisms.
These combined resources are more than adequate to support the rights protection mechanisms of the .HOTEIS registry.

30(a). Security Policy: Summary of the security policy for the proposed registry

Despegar Online SRL and its back-end operator, Neustar, Inc. ("Neustar"), recognize

the vital need to secure the systems and the integrity of the data in commercial
solutions. The .HOTEIS registry solution will leverage industry-best security
practices including the consideration of physical, network, server, and application
elements.

Neustar's approach to information security starts with comprehensive information
security policies. These are based on the industry best practices for security
including SANS (SysAdmin, Audit, Network, Security) Institute, NIST (National
Institute of Standards and Technology), and Center for Internet Security (CIS).
Policies are reviewed annually by Neustar's information security team.

The following is a summary of the security policies that will be used in the .HOTEIS
registry, including:

Summary of the security policies used in the registry operations;

Description of independent security assessments;

Description of security features that are appropriate for .HOTEIS;

List of commitments made to registrants regarding security levels;

All of the security policies and levels described in this section are appropriate
for the .HOTEIS registry.

30.(a).1 Summary of Security Policies

Neustar, Inc. has developed a comprehensive Information Security Program in order to
create effective administrative, technical, and physical safeguards for the
protection of its information assets, and to comply with Neustar's obligations under
applicable law, regulations, and contracts. This Program establishes Neustar's
policies for accessing, collecting, storing, using, transmitting, and protecting
electronic, paper, and other records containing sensitive information.

The Program defines:

The policies for internal users and its clients to ensure the safe, organized, and
fair use of information resources:

The rights that can be expected with that use;

The standards that must be met to effectively comply with policy;

The responsibilities of the owners, maintainers, and users of Neustar's information
resources;

Rules and principles used at Neustar to approach information security issues.

The following policies are included in the Program:

Acceptable Use Policy

The Acceptable Use Policy provides the "rules of behavior" covering all Neustar
Associates for using Neustar resources or accessing sensitive information.

Information Risk Management Policy

The Information Risk Management Policy describes the requirements for the ongoing
information security risk management program, including defining roles and
responsibilities for conducting and evaluating risk assessments; assessments of
technologies used to provide information security; and monitoring procedures used to
measure policy compliance.

Data Protection Policy

The Data Protection Policy provides the requirements for creating, storing,
transmitting, disclosing, and disposing of sensitive information, including data
classification and labeling requirements, the requirements for data retention.
Encryption and related technologies such as digital certificates are also covered
under this policy.

Third Party Policy

The Third Party Policy provides the requirements for handling service provider
contracts, including specifically the vetting process, required contract reviews,
and on-going monitoring of service providers for policy compliance.

Security Awareness and Training Policy

The Security Awareness and Training Policy provide the requirements for managing the
ongoing awareness and training program at Neustar. This includes awareness and
training activities provided to all Neustar Associates.

Incident Response Policy

The Incident Response Policy provides the requirements for reacting to reports of
potential security policy violations. This policy defines the necessary steps for
identifying and reporting security incidents, remediation of problems, and
conducting "lessons learned" post-mortem reviews in order to provide feedback on the
effectiveness of this Program. Additionally, this policy contains the requirement
for reporting data security breaches to the appropriate authorities and to the
public, as required by law, contractual requirements, or regulatory bodies.

Physical and Environmental Controls Policy

The Physical and Environment Controls Policy provides the requirements for securely
storing sensitive information and the supporting information technology equipment
and infrastructure. This policy includes details on the storage of paper records as

well as access to computer systems and equipment locations by authorized personnel
and visitors.
Privacy Policy
Neustar supports the right to privacy, including the rights of individuals to
control the dissemination and use of personal data that describes them, their
personal choices, or life experiences. Neustar supports domestic and international
laws and regulations that seek to protect the privacy rights of such individuals.
Identity and Access Management Policy
The Identity and Access Management Policy covers user accounts (login ID naming
convention, assignment, authoritative source) as well as ID lifecycle (request,
approval, creation, use, suspension, deletion, review), including provisions for
system⁄application accounts, shared⁄group accounts, guest⁄public accounts, temporary⁄
emergency accounts, administrative access, and remote access. This policy also
includes the user password policy requirements.
Network Security Policy
The Network Security Policy covers aspects of Neustar network infrastructure and the
technical controls in place to prevent and detect security policy violations.
Platform Security Policy
The Platform Security Policy covers the requirements for configuration management of
servers, shared systems, applications, databases, middle-ware, and desktops and
laptops owned or operated by Neustar Associates.
Mobile Device Security Policy
The Mobile Device Policy covers the requirements specific to mobile devices with
information storage or processing capabilities. This policy includes laptop
standards, as well as requirements for PDAs, mobile phones, digital cameras and
music players, and any other removable device capable of transmitting, processing,
or storing information.
Vulnerability and Threat Management Policy
The Vulnerability and Threat Management Policy provides the requirements for patch
management, vulnerability scanning, penetration testing, threat management (modeling
and monitoring), and the appropriate ties to the Risk Management Policy.
Monitoring and Audit Policy
The Monitoring and Audit Policy covers the details regarding which types of computer
events to record, how to maintain the logs, and the roles and responsibilities for
how to review, monitor, and respond to log information. This policy also includes
the requirements for backup, archival, reporting, forensics use, and retention of
audit logs.
Project and System Development and Maintenance Policy
The System Development and Maintenance Policy covers the minimum security
requirements for all software, application, and system development performed by or
on behalf of Neustar and the minimum security requirements for maintaining
information systems.
30.(a).2 Independent Assessment Reports
Neustar IT Operations is subject to yearly Sarbanes-Oxley (SOX), Statement on
Auditing Standards #70 (SAS70), and ISO audits. Testing of controls implemented by
Neustar management in the areas of access to programs and data, change management,
and IT Operations are subject to testing by both internal and external SOX and SAS70
audit groups. Audit Findings are communicated to process owners, Quality Management
Group, and Executive Management. Actions are taken to make process adjustments where
required and remediation of issues is monitored by internal audit and QM groups.
External Penetration Test is conducted by a third party on a yearly basis. As
authorized by Neustar, the third party performs an external Penetration Test to
review potential security weaknesses of network devices and hosts, and demonstrate
the impact to the environment. The assessment is conducted remotely from the
Internet with testing divided into four phases:
A network survey is performed in order to gain a better knowledge of the network
that was being tested;
Vulnerability scanning is initiated with all the hosts that are discovered in the
previous phase;
Identification of key systems for further exploitation is conducted;
Exploitation of the identified systems is attempted.
Each phase of the audit is supported by detailed documentation of audit procedures
and results. Identified vulnerabilities are classified as high, medium and low risk
to facilitate management's prioritization of remediation efforts. Tactical and
strategic recommendations are provided to management supported by reference to
industry best practices.
30.(a).3 Augmented Security Levels and Capabilities
There are no increased security levels specific for .HOTEIS. However, Neustar will
provide the same high level of security provided across all of the registries it

manages.
A key to Neustar's operational success is Neustar's highly structured operations practices. The standards and governance of these processes:
Include annual independent review of information security practices;
Include annual external penetration tests by a third party;
Conform to the ISO 9001 standard (Part of Neustar's ISO-based Quality Management System);
Are aligned to Information Technology Infrastructure Library (ITIL) and CoBIT best practices;
Are aligned with all aspects of ISO IEC 17799;
Are in compliance with Sarbanes-Oxley (SOX) requirements (audited annually);
Are focused on continuous process improvement (metrics driven with product scorecards reviewed monthly).
A summary view to Neustar's security policy in alignment with ISO 17799 can be found in section 30.(a).4, below.
30.(a).4 Commitments and Security Levels
The .HOTEIS registry commits to high security levels that are consistent with the needs of the TLD. These commitments include:
Compliance with High Security Standards;
Security procedures and practices that are in alignment with ISO 17799;
Annual SOC 2 Audits on all critical registry systems;
Annual 3rd Party Penetration Tests;
Annual Sarbanes Oxley Audits;
Highly Developed and Document Security Policies;
Compliance with all provisions described in section 30.(a).4, below, and in the attached security policy document.
Resources necessary for providing information security;
Fully documented security policies;
Annual security training for all operations personnel;
High Levels of Registry Security;
Multiple redundant data centers;
High Availability Design;
Architecture that includes multiple layers of security;
Diversified firewall and networking hardware vendors;
Multi-factor authentication for accessing registry systems;
Physical security access controls;
A 24∕7 manned Network Operations Center that monitors all systems and applications;
A 24∕7 manned Security Operations Center that monitors and mitigates DDoS attacks;
DDoS mitigation using traffic scrubbing technologies.

Annex 3.

ICANN

26 February 2013

Mr. Winston Fuhriman
Contact Information Redacted

RE: String similarity results for application ID 1-1016-75482

Dear Mr. Winston Fuhriman:

The String Similarity Panel has completed its review of the applied-for strings and ICANN would like to inform you of the Panel's findings for application ID 1-1016-75482.

After careful consideration and extensive review performed against criteria in Section 2.2.1.1 of the Applicant Guidebook, the String Similarity Panel has found that the applied-for string (.hotels) is visually similarly to another applied-for string (.hoteis), creating a probability of user confusion.

Due to this finding, the following two strings have been placed in a contention set:

String	Application ID	Applicant Name
.hotels	1-1016-75482	Booking.com B.V.
.hoteis	1-1249-87712	Despegar Online SRL

The complete list of contention sets is being published on the ICANN microsite (newgtlds.icann.org). If you have any questions regarding this communication, please contact the Customer Service Center at newgtld@icann.org.

Sincerely,

Christine Willett
Vice President, New gTLD Operations
Internet Corporation for Assigned Names and Numbers

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http://icann.org

NEW GTLD PROGRAM: STRING SIMILARITY CONTENTION SETS

26 February 2013

ICANN is publishing today the contention sets identified by the string similarity review for applications submitted as part of the New gTLD Program. Review the full list of contention sets here: PDF (/en/program-status/application-results/similarity-contention-26feb13-en.pdf) [162 KB], CSV (https://icann.box.com/shared/static/zhomj6atxakcv80iope5.csv) [65 KB] or from the Applicants' Corner (/en/applicants/corner) page on the new gTLD microsite.

Overall statistics about Contention Sets

- 2 Non-Exact Match Contention Sets
    - .hotels & .hoteis
    - .unicorn & .unicom
- 230 Exact Match Contention Sets
- 754 Total Applications in contention

The Current Application Status (http://gtldresult.icann.org/application-result/applicationstatus) page on the new gTLD microsite will be updated to reflect these contention sets.

The role of the String Similarity Panel is to assess whether a proposed gTLD string creates a probability of user confusion due to similarity with any reserved name, any existing TLD, any requested IDN ccTLD, or any new gTLD string applied for in the current application round.

Per the Applicant Guidebook, a contention set is a group of two or more applications containing identical or visually similar applied-for gTLD strings. For more information on string contention procedures, please refer to Module 4 (/en/applicants/agb/string-contention-procedures-04jun12-en.pdf) [PDF, 428 KB] of the Applicant Guidebook.

As a reminder, the objection filing period is open until 13 March 2013. For more information refer to the Objection & Dispute Resolution (/en/program-status/odr) page.

New gTLD String Similarity Contention Sets as of 26 February 2013			
NON-EXACT MATCH CONTENTION SETS			
SET #	String	App ID	Applicant
1	hoteis	1-1249-87712	Despegar Online SRL
	hotels	1-1016-75482	Booking.com B.V.
2	unicom	1-996-99850	China United Network Communications Corporation Limited
	unicorn	1-1771-82835	Unicorn a.s.

EXACT MATCH CONTENTION SETS			
SET #	String	App ID	Applicant
3	信息	1-868-7047	Afilias Limited
	信息	1-995-44061	Beijing Tele-info Network Technology Co., Ltd.
4	娱乐	1-963-13166	Modern Media Limited
	娱乐	1-1491-83816	Will Bloom, LLC
5	广东	1-1121-17301	Guangzhou YU Wei Information Technology Co., Ltd.
	广东	1-1309-35206	Xinhua News Agency Guangdong Branch 新华通讯社广东分社
6	微博	1-950-28485	Sina Corporation
	微博	1-1313-58483	Tencent Holdings Limited
7	网址	1-1159-3507	HU YI GLOBAL INFORMATION RESOURCES (HOLDING) COMPANY. HONGKONG LIMITED
	网址	1-994-51307	Top Level Domain Holdings Limited
8	网店	1-2102-26509	Global eCommerce TLD Asia Limited
	网店	1-858-36255	Zodiac Libra Limited
9	网站	1-2101-67873	Global Website TLD Asia Limited
	网站	1-1120-42188	RISE VICTORY LIMITED
10	africa	1-1165-42560	DotConnectAfrica Trust
	africa	1-1243-89583	UniForum SA (NPC) trading as Registry.Africa
11	apartments	1-909-9646	DERApartments, LLC
	apartments	1-1341-21066	June Maple, LLC
12	app	1-1013-7451	.APP REGISTRY INC.
	app	1-868-39920	Afilias Limited
	app	1-1315-63009	Amazon EU S.à r.l.
	app	1-1138-33325	Charleston Road Registry Inc.
	app	1-1182-25681	dot App Limited
	app	1-1778-4598	Dot App LLC
	app	1-1815-5857	DotApp Inc.
	app	1-1343-89689	Lone Maple, LLC
	app	1-875-87230	Merchant Law Group LLP
	app	1-1296-33564	NU DOT CO LLC
	app	1-927-15180	Top Level Domain Holdings Limited
	app	1-2039-18233	TRI Ventures, Inc.
	app	1-1289-59445	Webera Inc.

			EXACT MATCH CONTENTION SETS
SET #	String	App ID	Applicant
13	art	1-1013-98331	.ART REGISTRY INC.
	art	1-1844-98392	Aremi Group S.A.
	art	1-1344-70608	Baxter Tigers, LLC
	art	1-1097-20833	Dadotart, Inc.
	art	1-1675-51302	EFLUX.ART, LLC
	art	1-875-17602	Merchant Law Group LLP
	art	1-1086-100	Top Level Design, LLC
	art	1-927-15036	Top Level Domain Holdings Limited
	art	1-1211-27884	UK Creative Ideas Limited
	art	1-855-66616	Uniregistry, Corp.
14	auction	1-1347-98883	Sand Galley, LLC
	auction	1-855-2943	Uniregistry, Corp.
15	audio	1-1349-23181	Holly Castle, LLC
	audio	1-845-89968	Uniregistry, Corp.
16	auto	1-1351-20019	Big Maple, LLC
	auto	1-879-42119	Dot Auto LLC
	auto	1-1913-24731	Fegistry, LLC
	auto	1-855-72019	Uniregistry, Corp.
17	baby	1-1352-18081	Auburn Beach, LLC
	baby	1-1417-16218	Charleston Road Registry Inc.
	baby	1-1216-75929	Compact Registry Limited
	baby	1-1054-95858	DotBaby Inc.
	baby	1-1156-50969	Johnson & Johnson Services, Inc.
	baby	1-927-8340	Top Level Domain Holdings Limited
18	band	1-1350-42613	Auburn Hollow, LLC
	band	1-856-54878	Red Triangle, LLC
19	bank	1-1053-59307	Dotsecure Inc.
	bank	1-1035-13873	fTLD Registry Services LLC
20	bar	1-1870-98363	Punto 2012 Sociedad Anonima Promotora de Inversion de Capital Variable
	bar	1-1255-43729	United TLD Holdco Ltd.
21	baseball	1-1246-9615	MLB Advanced Media DH, LLC
	baseball	1-1353-23613	Silver Pass, LLC
22	basketball	1-1199-43437	dot Basketball Limited
	basketball	1-994-9184	Fédération Internationale de Basketball (FIBA)
	basketball	1-1355-53565	Little Hollow, LLC
23	beauty	1-1302-76087	L'Oréal
	beauty	1-1356-74155	Romeo Corner
	beauty	1-927-46801	Top Level Domain Holdings Limited
24	bet	1-868-21199	Afilias Limited
	bet	1-1201-33931	dot Bet Limited
	bet	1-1359-21671	Foggy Way, LLC
	bet	1-2015-28690	LADBROKES INTERNATIONAL PLC
25	bingo	1-1207-57645	dot Bingo Limited
	bingo	1-1360-70873	Sand Cedar, LLC

	EXACT MATCH CONTENTION SETS		
SET #	String	App ID	Applicant
26	blog	1-1013-74175	Afilias Domains No. 1 Limited
	blog	1-1680-47770	Charleston Road Registry Inc.
	blog	1-1358-79189	Corn Shadow, LLC
	blog	1-875-12119	Merchant Law Group LLP
	blog	1-1661-34613	Personals TLD Inc.
	blog	1-917-1259	PRIMER NIVEL S.A.
	blog	1-1086-2781	Top Level Design, LLC
	blog	1-927-96975	Top Level Domain Holdings Limited
	blog	1-1013-6634	Xserver, Inc.
27	boats	1-1362-58076	Black Shadow, LLC
	boats	1-909-78528	DERBoats, LLC
28	book	1-1315-44051	Amazon EU S.à r.l.
	book	1-1217-96477	Bronze Registry Limited
	book	1-1099-17603	Charleston Road Registry Inc.
	book	1-2029-6966	DotBook, LLC
	book	1-1361-60591	Double Bloom, LLC
	book	1-1132-20461	Global Domain Registry Pty Ltd
	book	1-1296-97422	NU DOT CO LLC
	book	1-1020-75316	R.R. Bowker LLC
	book	1-1038-7319	Top Level Domain Holdings Limited
29	box	1-1315-32664	Amazon EU S.à r.l.
	box	1-1309-75738	NS1 Limited
30	broadway	1-994-4128	Celebrate Broadway, Inc.
	broadway	1-1365-11798	Goose North, LLC
	broadway	1-1326-20526	KBE gTLD Holding Inc
31	broker	1-1332-82635	IG Group Holdings PLC
	broker	1-1364-8001	Spring North, LLC
32	buy	1-1315-53217	Amazon EU S.à r.l.
	buy	1-1368-92181	Bitter Sunset, LLC
	buy	1-1141-30048	Charleston Road Registry Inc.
	buy	1-1213-57533	dot Buy Limited
	buy	1-1694-75318	PVT Registry, LLC
33	cafe	1-1370-88467	Pioneer Canyon, LLC
	cafe	1-1868-50221	Punto 2012 Sociedad Anonima Promotora de Inversion de Capital Variable
34	cam	1-882-71415	AC Webconnecting Holding B.V.
	cam	1-1234-83704	dot Agency Limited
	cam	1-1255-75865	United TLD Holdco Ltd.
35	cars	1-909-45636	DERCars, LLC
	cars	1-1377-8759	Koko Castle, LLC
	cars	1-845-37810	Uniregistry, Corp.
36	casa	1-1379-61100	Extra Way, LLC
	casa	1-1109-26787	Go Daddy East, LLC
	casa	1-1038-47257	Top Level Domain Holdings Limited
37	casino	1-868-87246	Afilias Limited
	casino	1-1382-33633	Binky Sky, LLC
	casino	1-1203-44541	dot Casino Limited
	casino	1-907-62211	dotBeauty LLC

EXACT MATCH CONTENTION SETS

SET #	String	App ID	Applicant
38	charity	1-1384-49318	Corn Lake, LLC
	charity	1-1241-87032	Spring Registry Limited
39	chat	1-1237-60534	dot Chat Limited
	chat	1-1064-17982	IM TLD Inc.
	chat	1-1385-24288	Sand Fields, LLC
	chat	1-1279-42610	Top Level Spectrum, Inc.
40	church	1-1387-59691	Holly Fileds, LLC
	church	1-886-42389	Life Covenant Church, Inc.
41	city	1-1066-67099	DotCity Inc.
	city	1-1389-12139	Snow Sky, LLC
	city	1-1938-29030	TLD REGISTRY LIMITED
42	click	1-1068-4952	DotClick Inc.
	click	1-845-44500	Uniregistry, Corp.
43	cloud	1-1315-79670	Amazon EU S.à r.l.
	cloud	1-1669-75338	ARUBA S.p.A.
	cloud	1-1099-17190	Charleston Road Registry Inc.
	cloud	1-1747-41841	CloudNames AS
	cloud	1-1393-18458	Dash Cedar, LLC
	cloud	1-1027-19707	Symantec Corporation
	cloud	1-1038-9346	Top Level Domain Holdings Limited
44	club	1-864-71021	.CLUB DOMAINS, LLC
	club	1-1396-86079	Koko Manor, LLC
	club	1-875-24017	Merchant Law Group LLP
45	coach	1-1880-48905	Coach, Inc.
	coach	1-1397-64766	Koko Island, LLC
46	college	1-1400-95244	Binky Edge, LLC
	college	1-2137-73069	XYZ.COM LLC
47	construction	1-871-10185	Dot Construction, LLC
	construction	1-1403-98045	Fox Dynamite, LLC
48	corp	1-1139-21220	Charleston Road Registry Inc.
	corp	1-1407-41397	Cotton Fields, LLC
	corp	1-880-39342	Dot Registry LLC
	corp	1-2066-18958	DOTCORP LIMITED
	corp	1-1296-53960	NU DOT CO LLC
	corp	1-1693-13474	PROC Registry, LLC
49	country	1-1038-69660	Top Level Domain Holdings Limited
	country	1-845-1644	Uniregistry, Corp.
50	coupon	1-1315-85731	Amazon EU S.à r.l.
	coupon	1-1038-45713	Top Level Domain Holdings Limited
51	coupons	1-1413-96740	Black Island, LLC
	coupons	1-1668-71698	Coupons.com Incorporated
52	cpa	1-1910-48133	American Institute of Certified Public Accountants
	cpa	1-1911-56672	American Institute of Certified Public Accountants
	cpa	1-1138-86970	Charleston Road Registry Inc.
	cpa	1-1744-1971	CPA AUSTRALIA LTD
	cpa	1-1038-40570	Top Level Domain Holdings Limited
	cpa	1-1411-59458	Trixy Canyon
53	cricket	1-1205-96748	dot Cricket Limited
	cricket	1-1414-81052	Little Cover. LLC
	cricket	1-1038-10584	Top Level Domain Holdings Limited

EXACT MATCH CONTENTION SETS			
SET #	**String**	**App ID**	**Applicant**
54	cruise	1-1852-14467	Cruise Lines International Association Inc.
	cruise	1-1691-43949	Viking River Cruises (Bermuda) Ltd.
55	data	1-2009-38008	Dish DBS Corporation
	data	1-1605-75916	Romeo Birch, LLC
	data	1-927-73627	Top Level Domain Holdings Limited
56	dds	1-1138-74264	Charleston Road Registry Inc.
	dds	1-1038-5963	Top Level Domain Holdings Limited
57	deal	1-1315-35975	Amazon EU S.à r.l.
	deal	1-855-23694	Uniregistry, Corp.
58	deals	1-1056-93782	DotDeals Inc.
	deals	1-1419-43874	Sand Sunset, LLC
	deals	1-1110-25638	Top Level Domain Holdings Limited
59	delivery	1-1220-89939	dot Delivery Limited
	delivery	1-1420-57575	Steel Station, LLC
60	desi	1-1013-78434	Afilias Domains No. 4 Limited,
	desi	1-870-27617	Desi Networks LLC
61	design	1-1425-38025	Black Avenue, LLC
	design	1-2082-69005	Design Trend Registry Inc.
	design	1-1296-10164	NU DOT CO LLC
	design	1-1000-71907	STARTING DOT
	design	1-1086-90196	Top Level Design, LLC
	design	1-1038-80812	Top Level Domain Holdings Limited
	design	1-845-26161	Uniregistry, Corp.
	design	1-1013-4245	Xserver, Inc.
62	dev	1-1316-95567	Amazon EU S.à r.l.
	dev	1-1138-73066	Charleston Road Registry Inc.
63	diet	1-1225-36982	dot Diet Limited
	diet	1-1426-25607	Pioneer Hill, LLC
	diet	1-845-21294	Uniregistry, Corp.
64	direct	1-2007-43424	Dish DBS Corporation
	direct	1-1424-94823	Half Trail, LLC
65	discount	1-856-55254	Dot Discount, LLC
	discount	1-1431-6328	Holly Hill, LLC
66	diy	1-1678-58300	Charleston Road Registry Inc.
	diy	1-1326-57740	Lifestyle Domain Holdings, Inc.
67	docs	1-1682-12856	Charleston Road Registry Inc.
	docs	1-1129-14280	Microsoft Corporation
68	doctor	1-1430-52453	Brice Trail, LLC
	doctor	1-1060-13366	DotMedico TLD Inc.
	doctor	1-2026-56939	The Medical Registry Limited
69	dog	1-1140-60957	Charleston Road Registry Inc.
	dog	1-1429-22494	Koko Mill, LLC
	dog	1-1038-63631	Top Level Domain Holdings Limited
70	dot	1-1140-12803	Charleston Road Registry Inc.
	dot	1-2005-70840	Dish DBS Corporation
71	drive	1-1316-37524	Amazon EU S.à r.l.
	drive	1-1138-62581	Charleston Road Registry Inc.
72	earth	1-1140-20623	Charleston Road Registry Inc.
	earth	1-901-26957	Interlink Co., Ltd.
73	eco	1-912-59314	Big Room Inc.
	eco	1-1434-1370	Little Birch, LLC
	eco	1-1710-92415	Planet Dot Eco, LLC
	eco	1-1039-91823	Top Level Domain Holdings Limited
74	energy	1-1437-42738	Binky Birch, LLC
	energy	1-1221-4047	dot Energy Limited

EXACT MATCH CONTENTION SETS

SET #	String	App ID	Applicant
75	expert	1-1444-46322	Magic Pass, LLC
	expert	1-1970-27496	Red Circle, LLC
76	express	1-1690-33371	Express LLC
	express	1-1447-46365	Sea Sunset, LLC
77	family	1-1450-96002	Bitter Galley, LLC
	family	1-1683-11222	Charleston Road Registry Inc.
	family	1-845-55827	Uniregistry, Corp.
78	fashion	1-1455-48217	Big Dynamite, LLC
	fashion	1-1224-46400	Diamond Registry Limited
	fashion	1-1039-98979	Top Level Domain Holdings Limited
	fashion	1-845-22951	Uniregistry, Corp.
79	film	1-1138-87772	Charleston Road Registry Inc.
	film	1-1802-37358	Motion Picture Domain Registry Pty Ltd
	film	1-1452-20905	Outer Avenue, LLC
80	fish	1-856-22387	Dot Club LLC
	fish	1-1459-49079	Fox Woods, LLC
81	fishing	1-1039-82031	Top Level Domain Holdings Limited
	fishing	1-1255-72432	United TLD Holdco Ltd.
82	fit	1-1229-33615	Platinum Registry Limited
	fit	1-1039-18316	Top Level Domain Holdings Limited
83	flowers	1-1458-34042	Fern Willow, LLC
	flowers	1-1534-89307	Piper Ventures, LLC
	flowers	1-1039-50712	Top Level Domain Holdings Limited
	flowers	1-845-21975	Uniregistry, Corp.
84	food	1-1975-66983	Dot Food, LLC
	food	1-1326-50608	Lifestyle Domain Holdings, Inc.
	food	1-1462-36448	Wild Orchard, LLC
85	football	1-1185-40986	dot Football Limited
	football	1-1463-19656	Foggy Farms, LLC
86	forsale	1-909-18178	DERForsale, LLC
	forsale	1-1461-35653	Sea Oaks, LLC
87	forum	1-1212-56127	dot Forum Limited
	forum	1-1913-92671	Fegistry, LLC
	forum	1-1464-71170	June Hollow, LLC
88	free	1-1316-21923	Amazon EU S.à r.l.
	free	1-1141-1851	Charleston Road Registry Inc.
	free	1-1465-93738	Over Keep, LLC
	free	1-1039-66889	Top Level Domain Holdings Limited
	free	1-845-38175	Uniregistry, Corp.
89	fun	1-1680-35845	Charleston Road Registry Inc.
	fun	1-1133-86731	DOTSTRATEGY CO.
	fun	1-1274-35353	Oriental Trading Company, Inc.
90	furniture	1-1466-60532	Lone Fields, LLC
	furniture	1-845-27313	Uniregistry, Corp.
91	fyi	1-1683-65308	Charleston Road Registry Inc.
	fyi	1-1579-33517	Silver Tigers, LLC
92	game	1-1316-7998	Amazon EU S.à r.l.
	game	1-1660-73645	Beijing Gamease Age Digital Technology Co., Ltd.
	game	1-1138-34539	Charleston Road Registry Inc.
	game	1-1177-24251	Dot Game Limited
	game	1-855-17500	Uniregistry, Corp.
93	garden	1-1472-69003	Brice Maple, LLC
	garden	1-1039-6355	Top Level Domain Holdings Limited
	garden	1-845-21873	Uniregistry, Corp.
	gay	1-1713-23699	dotgay llc

	EXACT MATCH CONTENTION SETS		
SET #	String	App ID	Applicant
94	gay	1-1086-79087	Top Level Design, LLC
	gay	1-1039-47682	Top Level Domain Holdings Limited
	gay	1-1255-4825	United TLD Holdco Ltd.
95	gdn	1-1729-48006	Guardian News and Media Limited
	gdn	1-1866-26783	Joint Stock Company "Navigation-information systems"
96	gift	1-1218-92007	Dot Gift Limited
	gift	1-855-85881	Uniregistry, Corp.
97	gifts	1-1474-76888	Goose Sky, LLC
	gifts	1-1541-3638	Lucy Ventures, LLC
98	global	1-1747-40234	CloudNames AS
	global	1-1473-54534	Goose Falls, LLC
99	gmbh	1-1682-34664	Charleston Road Registry Inc.
	gmbh	1-1477-91047	Extra Dynamite, LLC
	gmbh	1-1952-21459	InterNetWire Web-Development GmbH
	gmbh	1-1296-52581	NU DOT CO LLC
	gmbh	1-1273-63351	TLDDOT GmbH
100	gold	1-1478-71326	June Edge, LLC
	gold	1-1143-36731	WGC (IOM) Limited
101	golf	1-900-40419	Dot-Golf LLC
	golf	1-1913-58763	Fegistry, LLC
	golf	1-1184-54304	Gold Registry Limited
	golf	1-1476-38656	Lone falls, LLC
102	goo	1-1142-62939	Charleston Road Registry Inc.
	goo	1-1810-48580	NTT Resonant Inc.
103	gratis	1-1481-2922	Pioneer Tigers, LLC
	gratis	1-845-42772	Uniregistry, Corp.
104	green	1-868-24661	Afilias Limited
	green	1-884-75541	DotGreen Community, Inc.
	green	1-1039-46343	Top Level Domain Holdings Limited
	green	1-1255-2257	United TLD Holdco Ltd.
105	grocery	1-1189-31055	Safeway Inc.
	grocery	1-2064-74519	Wal-Mart Stores, Inc.
106	group	1-1316-84755	Amazon EU S.à r.l.
	group	1-1296-48207	NU DOT CO LLC
	group	1-1482-30833	Romeo Town, LLC
	group	1-1086-21577	Top Level Design, LLC
	group	1-1171-93026	Tucows TLDs Inc.
107	guardian	1-1728-88967	Guardian News and Media Limited
	guardian	1-1298-37058	The Guardian Life Insurance Company of America
108	guide	1-1484-33046	Snow Moon, LLC
	guide	1-1039-17716	Top Level Domain Holdings Limited
109	hair	1-1013-46158	E&L Management Ltd
	hair	1-1302-98299	L'Oréal
110	health	1-868-3442	Afilias Limited
	health	1-1178-3236	dot Health Limited
	health	1-1684-6394	DotHealth, LLC
	health	1-1489-82287	Goose Fest, LLC

EXACT MATCH CONTENTION SETS

SET #	String	App ID	Applicant
111	help	1-1670-92378	Dot Tech LLC
	help	1-1499-91633	Pioneer Gardens, LLC
	help	1-845-3403	Uniregistry, Corp.
112	hockey	1-1204-89680	dot Hockey Limited
	hockey	1-1493-98462	Half Willow, LLC
113	home	1-1013-95616	.HOME REGISTRY INC.
	home	1-1494-83305	Baxter Pike, LLC
	home	1-1139-16944	Charleston Road Registry Inc.
	home	1-907-28623	Dot Home LLC
	home	1-1049-60075	DotHome Inc.
	home	1-2021-47438	Dothome Ltd
	home	1-1109-77450	Go Daddy East, LLC
	home	1-1326-24627	Lifestyle Domain Holdings, Inc.
	home	1-875-27253	Merchant Law Group LLP
	home	1-927-70273	Top Level Domain Holdings Limited
	home	1-845-48417	Uniregistry, Corp.
114	hosting	1-1286-14385	Dottransfer Inc.
	hosting	1-1507-65003	Trixy Birch, LLC
	hosting	1-855-76484	Uniregistry, Corp.
115	hot	1-1316-38620	Amazon EU S.à r.l.
	hot	1-1498-82780	Auburn Hill, LLC
	hot	1-907-22514	dotHot LLC
116	hotel	1-1249-36568	Despegar Online SRL
	hotel	1-1181-77853	dot Hotel Limited
	hotel	1-1059-97519	DotHotel Inc.
	hotel	1-1913-57874	Fegistry, LLC
	hotel	1-1032-95136	HOTEL Top-Level-Domain S.a.r.l
	hotel	1-1500-16803	Spring McCook, LLC
	hotel	1-927-25198	Top Level Domain Holdings Limited
117	immo	1-1511-99612	Auburn Bloom, LLC
	immo	1-1761-46474	dotimmobilie GmbH
	immo	1-1000-62742	STARTING DOT
	immo	1-1037-6617	Top Level Domain Holdings Limited
118	inc	1-868-6380	Afilias Limited
	inc	1-1271-68369	Baxter Sunset, LLC
	inc	1-1112-96698	C.V. TLDcare
	inc	1-1142-83944	Charleston Road Registry Inc.
	inc	1-1692-77224	CNI Registry, LLC
	inc	1-880-35979	Dot Registry LLC
	inc	1-890-52980	GMO Registry, Inc.
	inc	1-1309-22501	GTLD Limited
	inc	1-1296-44261	NU DOT CO LLC
	inc	1-927-63223	Top Level Domain Holdings Limited
	inc	1-855-4741	Uniregistry, Corp.
119	insurance	1-1512-20834	Auburn Park, LLC
	insurance	1-1063-32835	Dotfresh Inc.
	insurance	1-1035-75923	fTLD Registry Services LLC
	insurance	1-1269-14573	Progressive Casualty Insurance Company
120	jewelry	1-1253-11362	Richemont DNS Inc.
	jewelry	1-1520-93221	Wild Bloom, LLC
121	juegos	1-1522-61364	Goose Gardens, LLC
	juegos	1-845-92261	Uniregistry, Corp.

			EXACT MATCH CONTENTION SETS		

SET #	String	App ID	Applicant
122	kids	1-1316-67680	Amazon EU S.à r.l.
	kids	1-1309-46695	DotKids Foundation Limited
123	latino	1-2008-77299	Dish DBS Corporation
	latino	1-1038-32393	Top Level Domain Holdings Limited
124	law	1-1523-55821	Corn Dynamite, LLC
	law	1-1055-21389	Dotmaker Inc.
	law	1-875-2472	Merchant Law Group LLP
	law	1-1296-62922	NU DOT CO LLC
	law	1-1183-17612	Silver Registry Limited
	law	1-927-20582	Top Level Domain Holdings Limited
125	lawyer	1-1531-96078	Atomic Station, LLC
	lawyer	1-927-4468	Top Level Domain Holdings Limited
126	legal	1-1536-79233	Blue Falls, LLC
	legal	1-917-16797	PRIMER NIVEL S.A.
127	life	1-927-66189	CompassRose.Life Inc.
	life	1-1535-64595	Trixy Oaks, LLC
	life	1-1861-18909	Xiamen 35.com Technology Co.,Ltd
128	live	1-1680-95108	Charleston Road Registry Inc.
	live	1-1545-55209	Half Woods, LLC
	live	1-1129-83871	Microsoft Corporation
129	living	1-1326-92909	Lifestyle Domain Holdings, Inc.
	living	1-1547-37710	Outer Way, LLC
130	llc	1-868-65445	Afilias Limited
	llc	1-1417-41320	Charleston Road Registry Inc.
	llc	1-880-17627	Dot Registry LLC
	llc	1-1546-93002	Foggy North, LLC
	llc	1-1692-61931	LLC Registry, LLC
	llc	1-1013-43904	myLLC GmbH
	llc	1-1296-44333	NU DOT CO LLC
	llc	1-1086-42934	Top Level Design, LLC
	llc	1-927-11663	Top Level Domain Holdings Limited
131	llp	1-1142-52922	Charleston Road Registry Inc.
	llp	1-880-35508	Dot Registry LLC
	llp	1-1013-89480	myLLP GmbH
	llp	1-1693-56810	PLL Registry, LLC
132	loans	1-1065-49761	Dotserve Inc.
	loans	1-1544-18264	June Woods, LLC
133	lol	1-1681-93347	Charleston Road Registry Inc.
	lol	1-855-10958	Uniregistry, Corp.
134	love	1-1678-55117	Charleston Road Registry Inc.
	love	1-1549-37731	Hidden Cypress, LLC
	love	1-875-6276	Merchant Law Group LLP
	love	1-1253-49828	Richemont DNS Inc.
	love	1-1230-19511	Sierra Registry Limited
	love	1-927-91932	Top Level Domain Holdings Limited
	love	1-855-55170	Uniregistry, Corp.
135	ltd	1-868-84727	Afilias Limited
	ltd	1-1714-80638	C.V. TLDcare
	ltd	1-880-44249	Dot Registry LLC
	ltd	1-1694-79399	LTD Registry, LLC
	ltd	1-1013-19866	myLTD GmbH
	ltd	1-1296-16820	NU DOT CO LLC
	ltd	1-1550-65638	Over Corner, LLC

EXACT MATCH CONTENTION SETS

SET #	String	App ID	Applicant
136	luxury	1-1551-91953	Dash Tigers, LLC
	luxury	1-1265-36346	Luxury Partners, LLC
137	mail	1-1256-50020	1&1 Mail & Media GmbH
	mail	1-1013-47551	Afilias Domains No. 2 Limited,
	mail	1-1316-17384	Amazon EU S.à r.l.
	mail	1-1141-82929	Charleston Road Registry Inc.
	mail	1-890-53570	GMO Registry, Inc.
	mail	1-1548-63140	Victor Dale, LLC
	mail	1-1906-88399	WhitePages TLD LLC
138	map	1-1316-5335	Amazon EU S.à r.l.
	map	1-1417-46480	Charleston Road Registry Inc.
	map	1-1255-71670	United TLD Holdco Ltd.
139	marketing	1-1557-30317	Fern Pass, LLC
	marketing	1-1171-71619	Tucows TLDs Inc.
	marketing	1-855-23003	Uniregistry, Corp.
140	mba	1-1678-4292	Charleston Road Registry Inc.
	mba	1-1556-47497	Lone Hollow, LLC
	mba	1-1076-76766	Your Dot Phd, Inc.
141	med	1-1139-2965	Charleston Road Registry Inc.
	med	1-1320-21500	DocCheck AG
	med	1-1192-28569	HEXAP SAS
	med	1-907-38758	Medistry LLC
142	media	1-1560-69674	Grand Glen, LLC
	media	1-1171-56570	Tucows TLDs Inc.
	media	1-855-44456	Uniregistry, Corp.
143	memorial	1-868-46640	Afilias Limited
	memorial	1-1563-40885	Dog Beach, LLC
	memorial	1-2108-24342	dotCOOL, Inc.
144	merck	1-980-7217	Merck KGaA
	merck	1-1702-28003	Merck Registry Holdings, Inc.
	merck	1-1702-73085	Merck Registry Holdings, Inc.
145	mls	1-868-71271	Afilias Limited
	mls	1-1828-26452	The Canadian Real Estate Association
	mls	1-1888-47714	The Canadian Real Estate Association
146	mobile	1-1316-6133	Amazon EU S.à r.l.
	mobile	1-2012-89566	Dish DBS Corporation
	mobile	1-1566-85057	Pixie North, LLC
147	mom	1-1139-52584	Charleston Road Registry Inc.
	mom	1-855-75369	Uniregistry, Corp.
	mom	1-1255-96181	United TLD Holdco Ltd.
148	money	1-1179-41884	dot Money Limited
	money	1-1567-79679	Outer McCook, LLC
149	monster	1-1697-33789	Monster Worldwide, Inc.
	monster	1-1851-68583	Monster, Inc.
150	moto	1-1138-87257	Charleston Road Registry Inc.
	moto	1-1255-15838	United TLD Holdco Ltd.
151	movie	1-1316-44615	Amazon EU S.à r.l.
	movie	1-1140-55599	Charleston Road Registry Inc.
	movie	1-1920-39242	Dish DBS Corporation
	movie	1-1180-29599	dot Movie Limited
	movie	1-1803-2593	Motion Picture Domain Registry Pty Ltd
	movie	1-1570-42842	New Frostbite, LLC
	movie	1-1296-23277	NU DOT CO LLC
	movie	1-1290-2671	Webdeus Inc.

EXACT MATCH CONTENTION SETS

SET #	String	App ID	Applicant
152	music	1-959-51046	.music LLC
	music	1-1316-18029	Amazon EU S.à r.l.
	music	1-1680-18593	Charleston Road Registry Inc.
	music	1-1175-68062	dot Music Limited
	music	1-1115-14110	DotMusic / CGR E-Commerce Ltd
	music	1-1058-25065	DotMusic Inc.
	music	1-994-99764	Entertainment Names Inc.
	music	1-1571-12951	Victor Cross
153	news	1-1316-26110	Amazon EU S.à r.l.
	news	1-1172-3099	dot News Limited
	news	1-1057-44086	DotNews Inc.
	news	1-1573-27315	Hidden Bloom, LLC
	news	1-875-79821	Merchant Law Group LLP
	news	1-917-11894	PRIMER NIVEL S.A.
	news	1-855-42105	Uniregistry, Corp.
154	now	1-1316-48771	Amazon EU S.à r.l.
	now	1-861-67658	Global Top Level ApS
	now	1-1575-53902	Grand Turn, LLC
	now	1-979-89214	One.com A/S
	now	1-1309-93271	Starbucks (HK) Limited
	now	1-2138-10969	XYZ.COM LLC
155	one	1-1073-19391	DotAbout Inc.
	one	1-979-77610	One.com A/S
156	online	1-1574-83272	Bitter Frostbite, LLC
	online	1-856-67717	Dot Online LLC
	online	1-1070-97873	DotOnline Inc.
	online	1-1003-97300	I-REGISTRY Ltd., Niederlassung Deutschland
	online	1-2091-95954	Namecheap Inc.
	online	1-1171-72107	Tucows TLDs Inc.
157	osaka	1-921-91127	GMO Registry, Inc.
	osaka	1-901-9391	Interlink Co., Ltd.
158	party	1-1214-59403	Blue Sky Registry Limited
	party	1-1274-20024	Oriental Trading Company, Inc.
159	pay	1-1317-64413	Amazon EU S.à r.l.
	pay	1-1750-33973	DOTPAY SA
160	pet	1-868-95281	Afilias Limited
	pet	1-1678-92681	Charleston Road Registry Inc.
161	phd	1-1142-85390	Charleston Road Registry Inc.
	phd	1-1076-91066	Your Dot Phd, Inc.
162	phone	1-2011-80942	Dish DBS Corporation
	phone	1-1582-80831	Wild Frostbite, LLC
163	photography	1-1581-70192	Sugar Glen, LLC
	photography	1-1086-52200	Top Level Design, LLC
164	ping	1-1069-35959	DotPing Inc.
	ping	1-1833-90242	Ping Registry Provider, Inc.
165	pizza	1-1711-63214	Asiamix Digital Limited
	pizza	1-1583-6697	Foggy Moon, LLC
	pizza	1-927-3932	Top Level Domain Holdings Limited
	pizza	1-845-62256	Uniregistry, Corp.
166	place	1-1976-9220	1589757 Alberta Ltd.
	place	1-1584-14507	Snow Galley, LLC
167	play	1-1317-97559	Amazon EU S.à r.l.
	play	1-1683-17546	Charleston Road Registry Inc.
	play	1-1067-89443	Entertainment TLD Inc.
	play	1-1231-63687	Star Registry Limited

			EXACT MATCH CONTENTION SETS	

SET #	String	App ID	Applicant
168	plus	1-1140-91567	Charleston Road Registry Inc.
	plus	1-1589-56456	Sugar Mill, LLC
169	poker	1-1013-94737	Afilias Domains No. 5 Limited
	poker	1-1587-4615	Binky Mill, LLC
	poker	1-1202-1720	dot Poker Limited
	poker	1-1696-52899	Dot Poker LLC
170	property	1-1592-63879	Steel Goodbye, LLC
	property	1-927-66497	Top Level Domain Holdings Limited
	property	1-845-65560	Uniregistry, Corp.
171	racing	1-1594-21696	Black Orchard, LLC
	racing	1-1200-70811	Premier Registry Limited
	racing	1-855-75445	Uniregistry, Corp.
172	radio	1-868-75631	Afilias Limited
	radio	1-994-75477	BRS MEDIA, Inc.
	radio	1-1083-39123	European Broadcasting Union (EBU)
	radio	1-1593-8224	Tin Dale, LLC
173	realestate	1-907-1363	dotRealEstate LLC
	realestate	1-1597-13898	New North, LLC
	realestate	1-927-76919	Top Level Domain Holdings Limited
	realestate	1-845-86924	Uniregistry, Corp.
174	realty	1-1598-77594	Dash Bloom, LLC
	realty	1-1913-14988	Fegistry, LLC
175	red	1-868-93793	Afilias Limited
	red	1-1595-97277	Steel Keep, LLC
176	rent	1-909-9048	DERRent, LLC
	rent	1-1604-36499	Pearl Town, LLC
177	restaurant	1-1219-75721	dot Restaurant Limited
	restaurant	1-1610-3807	Snow Avenue, LLC
	restaurant	1-1110-95066	Top Level Domain Holdings Limited
	restaurant	1-845-64388	Uniregistry, Corp.
178	review	1-1208-90224	dot Review Limited
	review	1-1037-71433	Top Level Domain Holdings Limited
179	rip	1-1854-53707	dotRIP LIMITED
	rip	1-865-67813	Nevaeh Ventures Inc
	rip	1-1255-57953	United TLD Holdco Ltd.
180	rugby	1-1612-2805	Atomic Cross, LLC
	rugby	1-1206-66762	dot Rugby Limited
	rugby	1-994-63638	IRB Strategic Developments LImited
181	run	1-1232-61938	dot Run Limited
	run	1-1616-69474	Snow Park, LLC
182	sale	1-1235-38087	dot Sale Limited
	sale	1-1984-65341	Dot-Sale LLC
	sale	1-1617-57149	Half Bloom, LLC
	sale	1-1110-17668	Top Level Domain Holdings Limited
	sale	1-855-27044	Uniregistry, Corp.
183	salon	1-1028-58177	Aesthetics Practitioners Advisory Network Pty Ltd
	salon	1-939-82184	DaySmart Software Inc.
	salon	1-1302-58142	L'Oréal
	salon	1-1618-18834	Outer Orchard, LLC
184	sarl	1-1624-75239	Delta Orchard, LLC
	sarl	1-1013-83132	mySARL GmbH
185	sas	1-1323-55150	Research IP LLC
	sas	1-1794-37473	SAS AB (publ)
186	save	1-1317-82096	Amazon EU S.à r.l.
	save	1-855-45602	Uniregistry, Corp.

SET #	String	App ID	Applicant
EXACT MATCH CONTENTION SETS			
187	school	1-1913-18850	Fegistry, LLC
	school	1-1622-67844	Little Galley, LLC
	school	1-1110-66434	Top Level Domain Holdings Limited
	school	1-845-60801	Uniregistry, Corp.
188	science	1-1238-98669	dot Science Limited
	science	1-1110-8071	Top Level Domain Holdings Limited
189	search	1-1317-13549	Amazon EU S.à r.l.
	search	1-1626-61742	Bitter McCook, LLC
	search	1-1141-50966	Charleston Road Registry Inc.
	search	1-1209-16177	dot Now Limited
190	secure	1-1317-98508	Amazon EU S.à r.l.
	secure	1-1796-18939	Artemis Internet Inc.
191	security	1-2058-59499	Defender Security Company
	security	1-1625-43519	Fern Trail, LLC
	security	1-1027-69486	Symantec Corporation
192	sex	1-1106-79501	ICM Registry SX LLC
	sex	1-2113-59868	Internet Marketing Solutions Limited
193	shop	1-1317-37897	Amazon EU S.à r.l.
	shop	1-889-24496	BEIJING JINGDONG 360 DU E-COMMERCE LTD
	shop	1-1138-5993	Charleston Road Registry Inc.
	shop	1-1830-1672	Commercial Connect LLC
	shop	1-1176-45062	Dot Shop Limited
	shop	1-1051-32260	DotShop Inc.
	shop	1-890-52063	GMO Registry, Inc.
	shop	1-890-65213	GMO Registry, Inc.
	shop	1-1632-57390	Sugar Maple, LLC
194	shopping	1-1631-16988	Sea Tigers, LLC
	shopping	1-845-21316	Uniregistry, Corp.
195	show	1-1317-52877	Amazon EU S.à r.l.
	show	1-1417-47872	Charleston Road Registry Inc.
	show	1-1633-36635	Snow Beach, LLC
	show	1-866-43988	Zodiac Aries Limited
196	site	1-1681-36344	Charleston Road Registry Inc.
	site	1-1637-12997	Corn Mill, LLC
	site	1-1048-46315	DotSite Inc.
	site	1-901-58689	Interlink Co., Ltd.
	site	1-1110-76338	Top Level Domain Holdings Limited
197	ski	1-1000-18032	STARTING DOT
	ski	1-1636-27531	Wild Lake, LLC
198	soccer	1-1196-35744	dot Soccer Limited
	soccer	1-1635-18982	Foggy Shadow, LLC
	soccer	1-1905-88711	Soccer United Marketing, LLC
	soccer	1-1110-28392	Top Level Domain Holdings Limited
199	spa	1-1309-81322	Asia Spa and Wellness Promotion Council Limited
	spa	1-1619-92115	Foggy Sunset, LLC
	spa	1-1110-73648	Top Level Domain Holdings Limited
200	sport	1-1174-59954	dot Sport Limited
	sport	1-1012-71460	SportAccord
201	spot	1-1317-50025	Amazon EU S.à r.l.
	spot	1-1139-66836	Charleston Road Registry Inc.
	spot	1-1303-82330	Dotspot LLC
202	srl	1-1681-77547	Charleston Road Registry Inc.
	srl	1-1013-93642	mySRL GmbH
203	storage	1-1613-64465	Extra Beach, LLC
	storage	1-1687-62688	Self Storage Company LLC

		EXACT MATCH CONTENTION SETS	
SET #	**String**	**App ID**	**Applicant**
204	store	1-1317-24947	Amazon EU S.à r.l.
	store	1-1681-60225	Charleston Road Registry Inc.
	store	1-1789-97294	Dot Store Group LLC
	store	1-1052-82517	DotStore Inc.
	store	1-1609-60839	Sand Dale, LLC
	store	1-1110-26809	Top Level Domain Holdings Limited
	store	1-855-18880	Uniregistry, Corp.
205	stream	1-1881-96350	dot Stream Limited
	stream	1-2002-31471	Hughes Satellite Systems Corporation
206	studio	1-1309-22538	Namesphere Limited
	studio	1-1608-9291	Spring Goodbye, LLC
207	style	1-1602-30813	Binky Moon, LLC
	style	1-2081-48775	Evolving Style Registry Inc.
	style	1-1086-6187	Top Level Design, LLC
	style	1-1110-21114	Top Level Domain Holdings Limited
	style	1-845-11507	Uniregistry, Corp.
208	sucks	1-1596-35125	Dog Bloom, LLC
	sucks	1-1279-43617	Top Level Spectrum, Inc.
	sucks	1-2080-92776	Vox Populi Registry Inc.
209	talk	1-1317-29107	Amazon EU S.à r.l.
	talk	1-1417-17579	Charleston Road Registry Inc.
210	taxi	1-1239-50781	dot Taxi Limited
	taxi	1-1558-74769	Pine Falls, LLC
	taxi	1-1025-18840	Taxi Pay GmbH
211	team	1-868-34317	Afilias Limited
	team	1-1559-19356	Atomic Lake, LLC
	team	1-1141-13949	Charleston Road Registry Inc.
	team	1-855-72897	Uniregistry, Corp.
212	tech	1-1678-63859	Charleston Road Registry Inc.
	tech	1-1670-76346	Dot Tech LLC
	tech	1-1554-19894	Lone Moon, LLC
	tech	1-1296-83792	NU DOT CO LLC
	tech	1-1110-23787	Top Level Domain Holdings Limited
	tech	1-855-90632	Uniregistry, Corp.
213	tennis	1-1640-29241	Cotton Bloom, LLC
	tennis	1-1198-18833	dot Tennis Limited
	tennis	1-1723-69677	TENNIS AUSTRALIA LTD
	tennis	1-2036-18560	Washington Team Tennis, LLC
214	theater	1-1641-67063	Blue Tigers, LLC
	theater	1-1326-97308	KBE gTLD Holding Inc
215	tickets	1-2155-24150	Accent Media Limited
	tickets	1-1638-77826	Atomic McCook, LLC
	tickets	1-1233-26032	dot Tickets Limited
	tickets	1-1973-48269	Shubert Internet, Inc.
	tickets	1-1013-4506	Tickets TLD LLC
216	tires	1-2123-56973	Bridgestone Americas Tire Operations, LLC
	tires	1-1645-45928	Dog Edge, LLC
	tires	1-1884-1217	The Goodyear Tire & Rubber Company
217	trading	1-2047-17293	IG Group Holdings PLC
	trading	1-1654-94203	Little Manor, LLC
218	tube	1-1656-46642	Boss Castle, LLC
	tube	1-1142-5476	Charleston Road Registry Inc.
	tube	1-926-88379	Latin American Telecom LLC

EXACT MATCH CONTENTION SETS

SET #	String	App ID	Applicant
219	VIDEO	1-1317-52344	Amazon EU S.à r.l.
	VIDEO	1-1480-90854	Lone Tigers, LLC
	VIDEO	1-1110-29042	Top Level Domain Holdings Limited
	VIDEO	1-855-53391	Uniregistry, Corp.
220	VIP	1-1140-53549	Charleston Road Registry Inc.
	VIP	1-1003-40726	I-REGISTRY Ltd., Niederlassung Deutschland
	VIP	1-1532-71538	John Corner, LLC
	VIP	1-1037-88001	Top Level Domain Holdings Limited
	VIP	1-878-22942	VIP Registry Pte. Ltd.
	VIP	1-851-9629	Vipspace Enterprises LLC
221	VOTE	1-1530-99208	Double Falls, LLC
	VOTE	1-1013-44231	Monolith Registry LLC
222	WEB	1-1013-6638	Afilias Domains No. 3 Limited,
	WEB	1-1681-58699	Charleston Road Registry Inc.
	WEB	1-956-26846	DotWeb Inc.
	WEB	1-1296-36138	NU DOT CO LLC
	WEB	1-1527-54849	Ruby Glen, LLC
	WEB	1-1013-77165	Schlund Technologies GmbH
	WEB	1-1009-97005	Web.com Group, Inc.
223	WEBS	1-1033-22687	Vistaprint Limited
	WEBS	1-1033-73917	Vistaprint Limited
224	WEBSITE	1-1050-30871	DotWebsite Inc.
	WEBSITE	1-1524-44846	Fern Edge, LLC
	WEBSITE	1-1037-47594	Top Level Domain Holdings Limited
225	WEDDING	1-1037-16321	Top Level Domain Holdings Limited
	WEDDING	1-856-13669	Wedding TLD LLC
	WEDDING	1-1519-43980	Wild Madison, LLC
226	WEIBO	1-950-50638	Sina Corporation
	WEIBO	1-1313-41040	Tencent Holdings Limited
227	WINE	1-868-66341	Afilias Limited
	WINE	1-1223-37711	dot Wine Limited
	WINE	1-1515-14214	June Station, LLC
228	WORLD	1-1504-13424	Bitter Fields, LLC
	WORLD	1-1071-58353	DotWorld Inc.
229	WOW	1-1318-51358	Amazon EU S.à r.l.
	WOW	1-1142-53389	Charleston Road Registry Inc.
	WOW	1-1255-61847	United TLD Holdco Ltd.
230	YOGA	1-1037-89079	Top Level Domain Holdings Limited
	YOGA	1-845-11060	Uniregistry, Corp.
	YOGA	1-1502-54392	Victor Falls, LLC
231	YOU	1-1318-84751	Amazon EU S.à r.l.
	YOU	1-1682-29217	Charleston Road Registry Inc.
232	YUN	1-1318-12524	Amazon EU S.à r.l.
	YUN	1-974-89210	QIHOO 360 TECHNOLOGY CO. LTD.

Annex 4.

Our ref :   fpe/mne/107646.0000001
Your ref :

Flip Petillion
Advocaat
Contact Information Redacted

28 March 2013

To the attention of Mr. Steve Crocker
Chair, ICANN Board
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292
By regular mail and by e-mail: didp@icann.org

DIDP Request

Dear Sir,

Pursuant to ICANN's Documentary Information Disclosure Policy (DIDP), I hereby request on behalf of Booking.com B.V. the documents described below.

ICANN's Transparency Obligation and DIDP

The Articles of Incorporation establishing ICANN require that it act "through open and transparent processes," and ICANN's Bylaws further reinforce this by establishing that transparency is a core value that should guide the decisions and actions of ICANN. Articles of Incorporation, Art. 4; Bylaws, Art. I, Sec. 2 & Art. III, Sec. 1.
In accordance with this mandate to act transparently, ICANN's DIDP "is intended to ensure that information contained in documents concerning ICANN's operational activities, and within ICANN's possession, custody, or control, is made available to the public **unless there is a compelling reason for confidentiality**." ICANN Documentary Information Disclosure Policy, http://www.icann.org/en/about/transparency/didp (emphasis added). ICANN's DIDP therefore provides that, upon request, ICANN must provide certain "information not already publicly available."

Relevant Background

Booking.com is the applicant for the new gTLD ".hotels" (Application ID 1-1016-75482). On February 26, 2013, ICANN informed the applicant's primary contact that "the applied-for string (.hotels) is visually similar[] to another applied-for string (.hoteis), creating a probability of user confusion." Based on this finding of similarity, ".hotels" and ".hoteis" were placed in a contention set.
ICANN has previously made public some information about the String Similarity Review. For instance, the Applicant Guidebook, Module 2, describes in general terms the process by

which the review was conducted, including the fact that the review was to be completed by a String Similarity Panel. However, the previously-published information is incomplete: at no time has ICANN published any information about **the actual standards to be used to determine if strings were confusingly similar**.

Information Requested

Accordingly, Booking.com respectfully requests that ICANN produce all documents directly and indirectly relating to (1) the standard used to determine whether gTLD strings are confusingly similar and (2) the specific determination that ".hotels" and ".hoteis" are confusingly similar, including but not limited to:

1. The report of the String Similarity Panel detailing its findings with regard to all strings deemed to be confusingly similar, and in particular the findings as they relate to the strings ".hotels" and ".hoteis";

2. The report or reports of the String Similarity Panel detailing its findings with regard to any and all strings that were considered for inclusion in contention sets, and the analysis or reasons leading to the conclusion that they were sufficiently dissimilar;

3. Any report to the ICANN Board regarding the findings of the String Similarity Panel, and in particular any report relating to ".hotels" and ".hoteis";

4. Any research reports, studies, surveys, polls, or similar material that were created to evaluate whether gTLD strings, and in particular the strings ".hotels" and ".hoteis" , were likely to create confusion;

5. Documentation of any algorithm created to evaluate similarity between gTLD strings;

6. Any instructions, work plan, scope of work description, or similar material created by ICANN or the String Similarity Panel that includes discussion of the standard to be used in evaluating string similarity or potential consumer confusion;

7. Any report describing the selection criteria and/or the composition for the String Similarity Panel.

The information requested herein is not publicly available, and is therefore a proper subject for a DIDP Request.

The information does not meet any of the defined conditions for nondisclosure:

- The information was not provided by or to a government or international organization.

- The information is not likely to compromise the integrity of ICANN's deliberative or decision-making process. Booking.com is seeking only information and documents that relate to the establishment and implementation of a standard; whatever deliberations may have occurred, the end result—the established standard and its implementation— cannot be confidential. Because ICANN is required by its Articles of Incorporation and

Bylaws to "operate to the maximum extent feasible in an open and transparent manner," including by "employing open and transparent policy development mechanisms," and "making decisions by applying documented policies neutrally and objectively," there can be no justification for refusing to publish the requested documents.

- The information is not likely to compromise the integrity of the deliberative or decision-making process between ICANN and its constituencies or other entities, for the same reasons as noted above.

- The information is unrelated to any personnel, medical, contractual, remuneration, or similar records.

- The information is not likely to impermissibly prejudice any parties commercial, financial, or competitive interests. Additionally, to the extent that any requested document contains such information, and the information is unrelated to the substance of the String Similarity Review (for example, any financial or contract information related to consulting services), such information can be redacted before the publication of the documents.

- The information is not confidential business information or internal policies or procedures.

- The information will not endanger the life, health, or safety of any individual nor prejudice the administration of justice.

- The information is not subject to attorney-client privilege.

- The information is not drafts of communications.

- The information is not related in any way to the security or stability of the Internet.

- The information is not trade secrets or financial information;

- The information request is reasonable, not excessive or overly burdensome, compliance is feasible, and there is no abuse.

Finally, to the extent any of the information does fall into one of the defined conditions for non-disclosure, ICANN should nonetheless disclose the information, as the public interest in disclosing the information outweighs any harm that might be caused by disclosure. Indeed, there can be no harm from disclosing the information, as the ICANN community is entitled to know the standards by which ICANN (together with any consultants) makes decisions that determine what new gTLDs will be added to the Internet. ICANN's transparency obligation, described by ICANN's own Bylaws and Articles of Incorporation, require publication of information related to the standard governing what strings are confusingly similar, and the process, facts, and analysis used to implement that standard.

Moreover, unless the requested information is published, the ICANN community will have no way to evaluate whether ICANN has met its obligations to act fairly, for the benefit of the community, and in accord with its own policies. Additionally, the Expert Panels adjudicating String Confusion Objections will not be able to fairly or consistently apply the standards. And future applicants will have no reliable guidance for determining if a string is confusingly similar to an existing string, which will result in significant waste of money and time in the submission of applications with no chance of success.

Conclusion

In short, because there is no "compelling reason for confidentiality" and numerous compelling reasons for publication, and because publication is required by ICANN's own Bylaws and Articles of Incorporation, Booking.com urges the publication of the requested information, including in particular the specific documents described above.

Yours sincerely,

Flip Petillion
Crowell & Moring LLP
Contact Information Redacted

Annex 5.

Response to Documentary Information Disclosure Policy Request

To: Mr. Flip Petillion, Crowell & Moring LLP

Date: 27 April 2013

Re: Request No. 20130328-1

_____

Thank you for your Request for Information dated 28 March 2013 (the "Request"), which was submitted through the Internet Corporation for Assigned Names and Numbers' (ICANN) Documentary Information Disclosure Policy (DIDP). For reference, a copy of your Request is attached to the email forwarding this Response.

Items Requested

In summary, the Request seeks "all documents directly and indirectly relating to (1) the standard used to determine whether gTLD strings are confusingly similar and (2) the specific determination that ".hotels" and ".hoteis" are confusingly similar." The Request identified certain specific categories of documents, including:

a. Reports of the String Similarity Panel detailing findings related to strings determined to be confusingly similar and considered for inclusion in contention sets, including analysis and reasons for finding of "sufficient[] dissimilar[ity]" or particular findings relating to ".hotels" and ".hoteis." (Items 1, 2)

b. Reports to the ICANN Board on the findings of the String Similarity Panel. (Item 3)

c. Research reports, studies, surveys, polls, or similar materials created to evaluate whether gTLD strings were likely to create confusion, as well as instructions, work plans and scope of work descriptions or similar materials that include discussions of standards uses in evaluating string similarity or potential consumer confusion. (Items 4, 6)

d. Documentation of any algorithm created to evaluate similarity between gTLD strings. (Item 5)

e. Reports describing the selection criteria and/or the composition for the String Similarity Panel. (Item 7)

Response

An independent String Similarity Panel (SSP), coordinated by InterConnect Communications, in partnership with the University College London, performed the string similarity review specified at Section 2.2.1.1 of the Applicant Guidebook, available at http://newgtlds.icann.org/en/applicants/agb/guidebook-full-04jun12-en.pdf. The Applicant Guidebook sets out detail regarding the string similarity review, including the review methodology. The SSP is responsible for the development of its own process

documentation and methodology for performing the string similarity review, and is also responsible for the maintenance of its own work papers. Many of the items that are sought from ICANN within the Request are therefore not in existence within ICANN and cannot be provided in response to the DIDP Request. ICANN will, however, shortly be posting the SSP's String Similarity Process and Workflow on the New gTLD microsite, likely at http://newgtlds.icann.org/en/announcements-and-media/announcement-26feb13-en.

The report of the SSP regarding contention sets is already publicly posted at http://newgtlds.icann.org/en/announcements-and-media/announcement-26feb13-en. ICANN is not in possession of the SSP's work papers, or other documentation containing further detail regarding findings for the strings at issue in your Request, or "analysis or reasons leading to the conclusion that [strings] were sufficiently dissimilar." To the extent that the New gTLD Program Committee (which stands in the stead of the Board on matters relating to the New gTLD Program) received any reporting regarding the findings of the SSP, those documents have already been evaluated for publication and are provided in the Board Briefing Material accompanying the New gTLD Program Committee minutes, at http://www.icann.org/en/groups/board/meetings.

Some of the documents already identified in this DIDP Request also meet the Request for research reports, studies, or other documentation evaluating the potential similarity of strings, or discussing standards for the evaluation of string similarity (item c above). To the extent ICANN has any other documentary information that falls within this category of information, those documents are not appropriate for public disclosure through the DIDP, as set forth below.

ICANN has already publicly announced that it identified the SWORD algorithm, available at https://icann.sword-group.com/algorithm/, to assist in evaluation of string similarity. The SWORD algorithm is not proprietary to or defined by ICANN, nor are the details of the SWORD algorithm available from ICANN. It is the work of an external company (SWORD). To the extent that ICANN has details of the SWORD algorithm, ICANN cannot distribute the proprietary information of a third party. In the event that the SSP may have utilized different algorithms in performing its work, ICANN does not maintain documentation related any other algorithms.

ICANN's scope of work and selection criteria for the SSP are set forth in the expressions of interest document that is publicly available at http://archive.icann.org/en/topics/new-gtlds/eoi-string-sim-31jul09-en.pdf. InterConnect Communications, in partnership with the University College London, the entities selected to perform the SSP work, were responsible for the compilation of the panel membership. The documentation received by ICANN in response to the expressions of interest, to the extent that it is responsive to your Request, is not appropriate for public disclosure due to the expectations of confidentiality that accompany such proposals.

The following Defined Conditions for Nondisclosure are applicable to this Request:

- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.

- Information provided to ICANN by a party that, if disclosed, would or would be likely to materially prejudice the commercial interests, financial interests, and/or competitive position of such party or was provided to ICANN pursuant to a nondisclosure agreement or nondisclosure provision within an agreement.

- Confidential business information and/or internal policies and procedures.

- Information subject to the attorney– client, attorney work product privilege, or any other applicable privilege, or disclosure of which might prejudice any internal, governmental, or legal investigation.

- Drafts of all correspondence, reports, documents, agreements, contracts, emails, or any other forms of communication.

- Trade secrets and commercial and financial information not publicly disclosed by ICANN.

Although some of your analysis regarding the Conditions for Nondisclosure might have been relevant in a different context, such an analysis cannot be undertaken without reference to the documentation at issue. For example, ICANN cannot violate contractual conditions that require ICANN to maintain items as confidential solely because the Request proffers that no such conditions apply. Similarly, ICANN does not release draft documentation – particularly if draft documentation was shared for the purpose of facilitating deliberations or decision making – because drafts are not reliable sources for information on what actually occurred or standards that were actually applied. There are no particular circumstances here for which public interest in disclosing information subject to any of the Defined Conditions for Nondisclosure above outweighs the harm that may be caused to ICANN, its contractual relationships and its contractors deliberative processes by the requested disclosure.

About DIDP

ICANN's DIDP is limited to requests for information already in existence within ICANN that is not publicly available. In addition, the DIDP sets forth Defined Conditions of Nondisclosure. To review a copy of the DIDP, which is contained within the ICANN Accountability & Transparency: Framework and Principles please see http://www.icann.org/en/about/transparency/didp. ICANN makes every effort to be as responsive as possible to the entirety of your Request.

We hope this information is helpful. If you have any further inquiries, please forward them to didp@icann.org.

Annex 6.

Janssen, Jan

From:	Petillion, Flip
Sent:	jeudi 9 mai 2013 00:38
To:	Janssen, Jan; Nelissen, Mariet
Subject:	FW: Response to DIDP Request 20130328-1
Attachments:	RE: [reconsideration request] Request for Reconsideration the Decisions of February 26, 2013 Materially Affecting Booking.com B.V.

From: Petillion, Flip
Sent: jeudi 9 mai 2013 00:36
To: DIDP
Cc: reconsideration@icann.org
Subject: RE: Response to DIDP Request 20130328-1

Dear Sir,

We have received ICANN's 27 April 2013 Response to DIDP Request No. 20130328-1 sent on behalf of Booking.com.

We note that ICANN's response fails to provide any additional information or address any of Booking.com's concerns as conveyed in its DIDP Request or Request for Reconsideration. Accordingly, Booking.com considers that its Request for Reconsideration (see the attached string of mails) remains valid and pending.

However, we wish to clarify the deadline for any amendments to that Request for Reconsideration. Although ICANN's DIDP Response states that "ICANN will [ ] shortly be posting the SSP's String Similarity Process and Workflow on the New gTLD microsite", as of today, 9 May 2013, this information still has not been posted. As a result, obviously, Booking.com remains without information regarding how ICANN's decision was made to place .hotels in a contention set - including information that ICANN explicitly stated it still planned to post.

When will Booking.com finally receive such information so it can evaluate ICANN's response in light of its obligations?

Additionally, ICANN did not respond to the request that Booking.com be given 30 days following receipt of the DIDP Response to file any amendments to our Request for Reconsideration. When will ICANN inform Booking.com as to how long it has to revise its Request for Reconsideration?

In light of the above, Booking.com requests confirmation that SSP's String Similarity Process and Workflow will be posted, and an actual date when that posting will take place. Booking.com also requests that ICANN confirms a 30-day deadline to file any revisions and confirms that the 30-day period will commence as of the date the String Similarity Process and Workflow information (as well as any additional information ICANN plans to post regarding its decision) is posted on ICANN's microsite.

Yours sincerely,

Flip Petillion

From: DIDP [mailto:didp@icann.org]
Sent: samedi 27 avril 2013 20:11
To: Petillion, Flip
Subject: Response to DIDP Request 20130328-1

Dear Mr. Petillion,

Attached please find a response to your Request 20130228-1 made pursuant to ICANN's Documentary Information Disclosure Policy.

Best regards,

ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094

Annex 7.

Janssen, Jan

From: Petillion, Flip
Sent: jeudi 23 mai 2013 16:26
To: ICANN Reconsideration; didp@icann.org
Subject: RE: [reconsideration request] Response to DIDP Request 20130328-1

Dear Sir,

Reference is made to the email below. Unless mistaken, I have not yet received any response and ICANN has not posted the SSP's String Similarity Process and Workflow.

When will this be done?

For the sake of clarity, I have understood that no 30 days period is running so far.

Yours sincerely,

Flip Petillion

From: ICANN Reconsideration [mailto:reconsideration@icann.org]
Sent: mardi 14 mai 2013 03:39
To: Petillion, Flip
Subject: Re: [reconsideration request] Response to DIDP Request 20130328-1

Dear Mr. Petilion,

Thank you for your patience. ICANN intends to post the string similarity panel process documentation on or before close of business Friday, 17 May 2013 (PDT). Pursuant to your request, ICANN will afford you 30 days from the posting of the process document for the submission of a revised Request for Reconsideration.

Best regards,

ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094

1

On May 8, 2013, at 3:36 PM, "Petillion, Flip" Contact Information Redacted wrote:

Dear Sir,

We have received ICANN's 27 April 2013 Response to DIDP Request No. 20130328-1 sent on behalf of Booking.com.

We note that ICANN's response fails to provide any additional information or address any of Booking.com's concerns as conveyed in its DIDP Request or Request for Reconsideration. Accordingly, Booking.com considers that its Request for Reconsideration (see the attached string of mails) remains valid and pending.

However, we wish to clarify the deadline for any amendments to that Request for Reconsideration. Although ICANN's DIDP Response states that "ICANN will [ ] shortly be posting the SSP's String Similarity Process and Workflow on the New gTLD microsite", as of today, 9 May 2013, this information still has not been posted. As a result, obviously, Booking.com remains without information regarding how ICANN's decision was made to place .hotels in a contention set – including information that ICANN explicitly stated it still planned to post.

When will Booking.com finally receive such information so it can evaluate ICANN's response in light of its obligations?

Additionally, ICANN did not respond to the request that Booking.com be given 30 days following receipt of the DIDP Response to file any amendments to our Request for Reconsideration. When will ICANN inform Booking.com as to how long it has to revise its Request for Reconsideration?

In light of the above, Booking.com requests confirmation that SSP's String Similarity Process and Workflow will be posted, and an actual date when that posting will take place. Booking.com also requests that ICANN confirms a 30-day deadline to file any revisions and confirms that the 30-day period will commence as of the date the String Similarity Process and Workflow information (as well as any additional information ICANN plans to post regarding its decision) is posted on ICANN's microsite.

Yours sincerely,

Flip Petillion

From: DIDP [mailto:didp@icann.org]
Sent: samedi 27 avril 2013 20:11
To: Petillion, Flip
Subject: Response to DIDP Request 20130328-1

Dear Mr. Petillion,

Attached please find a response to your Request 20130228-1 made pursuant to ICANN's Documentary Information Disclosure Policy.

Best regards,

ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094

From: "Petillion, Flip"   Contact Information Redacted
Subject: RE: [reconsideration request] Request for Reconsideration the Decisions of February 26, 2013 Materially Affecting Booking.com B.V.
Date: April 1, 2013 7:04:14 AM PDT
To: 'ICANN Reconsideration' <reconsideration@icann.org>

Dear Sir,

I confirm we wish to wait. However, I would appreciate a 30 days period instead of two weeks. As we participate at the ICANN meeting in Beijing, there will be little to no time for us to work on this file and amend the Reconsideration Request.

Thank you.

Best regards

Flip Petillion

From: ICANN Reconsideration [mailto:reconsideration@icann.org]
Sent: vendredi 29 mars 2013 20:16
To: Petillion, Flip
Subject: Re: [reconsideration request] Request for Reconsideration the Decisions of February 26, 2013 Materially Affecting Booking.com B.V.

Dear Mr. Petillion,

ICANN is in receipt of both your Request for Reconsideration and your request submitted under the Documentary Information Disclosure Policy (DIDP), both on 28 March 2013. It appears that you are indicating that you would like to wait until you receive the response to the DIDP Request before the BGC reviews your Reconsideration Request. Please confirm.

If so, ICANN will consider the date of filing of the Reconsideration Request as 28 March 2013, but will allow you an opportunity to amend the Reconsideration Request based on the responses received to your DIDP Request. All final materials for the Reconsideration Request would have to be provided within two weeks of your receipt of ICANN's response to the DIDP Request. All deadlines in the Reconsideration process would then be calculated from the date you provide the amended Reconsideration Request.

If you do not wish to wait, the BGC will proceed to consideration of your Reconsideration Request as filed on 28 March 2013.

Please let us know how you wish to proceed.

Best regards,

ICANN

On Mar 28, 2013, at 5:33 AM, "Petillion, Flip" <Contact Information Redacted wrote:

Dear Mr. Crocker,

Please see the attached.

Yours sincerely,

Flip Petillion

Flip Petillion
Partner   Contact Information Redacted

Crowell & Moring LLP | www.crowell.com
Contact Information Redacted

4

<3077158_13 03 28 Letter to ICANN re Request for Reconsideration (2)-c.PDF><3077195_Attachment 4-c.PDF><3077194_Attachment 3-c.PDF><3077193_Attachment 2-c.PDF><3077192_Attachment 1-c.PDF>

Annex 8.

InterConnect Communications
A Telcordia Technologies Company

String Similarity new gTLD Evaluation Panel – Process Description

Step	Name	Actions	Tracking	Who
1	Application Receipt and Verification Checks	• Incoming applications from ICANN automatically generate new tickets in internal tracking system – one record per applied for string • Incoming strings are sorted in Unicode order prior to entering into internal tracking system • Each ticket is automatically assigned an identifying ticket number in internal tracking system • The number of tickets generated is checked against the number of tickets sent by ICANN • For each ticket, a check is done to ensure that the string, slot and applicant is correctly entered into the system • For each record the SWORD algorithm result where the score is greater or equal to 70 is recorded • When this step is complete the record is changed from "INITIAL VERIFICATION" to "INITIAL ASSESSMENT" state	• Records each have the following information (string, slot ID, applicant) • Records initially set to "INITIAL VERIFICATION" state • Due date set to "time of entry into system" plus two working days • Internal records are initially assigned to Operations Manager	• String Similarity Operations Manager does all of these tasks
2	Initial Assessment	• Operations manager posts a copy of notice/agreement of non-conflict for the string in internal tracking system – in the case of conflict, notice is provided to ICANN • Visual assessment of each string is done by operations manager to provide an initial assessment – first, ASCII or IDN (recorded in internal tracking system as string type); second, easy/possibly contentious/hard/IDN (recorded in internal tracking system as string difficulty)? • Internal records for each string are set to "AWAITING INITIAL EVALUATION" state	• Internal records enter this step in "INITIAL ASSESSMENT" state • Initial assessment is completed by the Operations Manager • Due date set to two working days in the future • Records leave this step in "AWAITING INITIAL EVALUATION" state	• Operations manager completes initial assessment of all strings entered into internal tracking system in step one. • When this step is complete the internal records for each string are returned to the Operations Manager

Step	Name	Actions	Tracking	Who
3a	Initial Assignment for ASCII Strings	• Operations Manager assigns each record with a string type of ASCII to an ICC evaluator • Operations Manager places current copy of TLD list (by reference) in the evaluation workbook • Operations Manager places current copy of reserved strings in the evaluation workbook • Operations Manager puts all pairwise comparison strings in the evaluation workbook • Tickets are put in "INITIAL EVALUATION IN PROGRESS" state	• Records enter this step in "AWAITING INITIAL EVALUATION" state • Internal records are given to ICC/UCL evaluators • Due date is set to three working days • Internal tracking system notifies evaluator	• Operations Manager assigns tickets to ICC/UCL evaluators
3b	Initial Assignment for IDN Strings	• Operations Manager identifies languages needed for initial evaluation of IDN strings based on list provided by ICANN • Operations Manager identifies number of strings in each language based on list provided by ICANN • Operations Manager coordinates with UCL Liaison to identify evaluators for IDN strings • UCL Liaison establishes evaluators for specific IDN strings and places nominations in each record for IDN applications • UCL Liaison uses nomination list to assign each ticket with a string type of IDN to a UCL nominated evaluator • Operations Manager places current copy of TLD list (by reference) in the workbook • Operations Manager places current copy of reserved strings (by reference) in the workbook • Operations Manager places current copy of Declared Variants list (by reference) in the workbook • Operations Manager places current copy of all IDN fast track strings (by reference) in the workbook • Operations Manager puts all pairwise comparison strings in the evaluation workbook • Internal records are put in "INITIAL EVALUATION IN PROGRESS" state	• Records enter this step in "AWAITING INITIAL EVALUATION" state • Workbooks are given to UCL evaluators • Due date is set to three working days • Internal tracking system notifies evaluator – notice in internal tracking system and by email • Records leave this step in "INITIAL EVALUATION IN PROGRESS"	• Operations Manager identifies IDN language and scope requirements based on initial material from ICANN • Operations Manager coordinates with UCL Liaison to state needs and get recommended UCL evaluators • UCL Liaison assigns evaluation workbooks to UCL evaluators

Step	Name	Actions	Tracking	Who
4	Initial Evaluation	• Evaluator posts a copy of notice/agreement of non-conflict for the string in internal tracking system – in the case of a conflict, the Operations Manager selects a new assessor using the mechanism in 3a or 3b as appropriate • Evaluator checks the string against the current copy of the TLD list • Evaluator checks the string against the current copy of the reserved string list • Evaluator checks against the current list of IDN fast track strings • Evaluator checks against the current Declared Variants List • For any string that does not meet one of the three tests above: the record for the string is put into the "FAILED INITIAL EVALUATION" state; string in conflict is recorded in internal tracking system; the record is given to the Operations Manager; the process moves to step 7a, below. • Evaluator optionally adds relevant details, if needed, explaining any failure in free form in the workbook. • For all other strings: the record is put into the "PASSED INITIAL EVALUATION" state; the process moves to step 5 below.	• Records enter this step in "INITIAL EVALUATION IN PROGRESS" state • Evaluators have three working days to make the initial evaluation • Records are owned by the evaluators • Records leave this step in either "FAILED INITIAL EVALUATION" or "PASSED INITIAL EVALUATION" state • At the end of this step either the Operations Manager owns the record for the individual string (in the event that the string did not pass); or, the Evaluator continues to own the record.	• Evaluators – ICC and UCL – process the initial evaluation • Evaluators continue to own the record throughout this step unless the Initial Evaluation fails (then, the Operations Manager is the owner of the record)

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Step	Name	Actions	Tracking	Who
5a	Detailed Evaluation for ASCII Strings	• Evaluator completes a pairwise comparison of the applied for string and all other applied for strings • Evaluator considers SWORD pair scores as documented in the string evaluation workbook • The results of these two evaluations are documented in the string evaluation workbook • If the string is found to resemble another visually that it is likely to deceive or cause confusion: the tracking record for the string is put into "IN CONTENTION SET – AWAITING CONFIRMATION" state; the string, ticket number and slot ID of the strings in the contention set are documented; the record is assigned to the Operations Manager. • If the string is not found to be similar to any other string: the record is put into "PASSED DETAILED EVALUATION" state; the tracking record is assigned to the Operations Manager.	• Tracking records enter this step in "PASSED INITIAL EVALUATION" state • Records are set with a due date of ten working days • At the end of this step the record is either in the "IN CONTENTION SET – AWAITING CONFIRMATION" state or the "PASSED DETAILED EVALUATION" state • At the end of this step, the record is always owned by the Operations Manager	• Strings are evaluated by ICC/UCL evaluators • Results are returned to the Operations Manager

Step	Name	Actions	Tracking	Who
5b	Detailed Evaluation for IDN Strings	• Evaluator completes a pairwise comparison of the applied for string and all other applied for strings • Evaluator considers SWORD pair scores as documented in the string evaluation workbook • If the IDN is two characters in length, the evaluator completes the review against any one-character label (in any script), and any possible two-character ASCII combination. • The results of these four evaluations are documented in the string evaluation workbook • If the string is found to resemble another visually that it is likely to deceive or cause confusion: the tracking record is put into "IN CONTENTION SET – AWAITING CONFIRMATION" state; the string, ticket number and slot ID of the strings in the contention set are documented; the record is assigned to the Operations Manager. • If the string is not found to be similar to any other string: the ticket is put into "PASSED DETAILED EVALUATION" state; the tracking record is assigned to the Operations Manager.	• Tracking records enter this step in "PASSED INITIAL EVALUATION" state • Records are set with a due date of fifteen working days • At the end of this step the record is either in the "IN CONTENTION SET – AWAITING CONFIRMATION" state or the "PASSED DETAILED EVALUATION" state • At the end of this step, the tracking record is always owned by the Operations Manager	• Strings are evaluated by UCL evaluators • Results are returned to the Operations Manager

INTERCONNECT COMMUNICATIONS
A Telcordia Technologies Company

Step	Name	Actions	Tracking	Who
6a	Independent Contention Set Processing for ASCII Strings	• The Operations Manager requests that the Core Team execute an independent contention set assessment of the ASCII string in the tracking record. • The record and result is presented to the Core Team for quality assurance • If the result of the independent assessment results in a confirmation of the results in step 5a above, the record is placed in the "IN CONTENTION SET – CONFIRMED" state and the record is reassigned to the Operations Manager • If the result of the independent assessment results in a confirmation of the contention set, an automatic re-review of the string is completed using the process documented in steps 3, 4 and 5 • If the result of the independent assessment results in no confirmation or a question about the contention set, the ticket is placed in "PASSED INITIAL EVALUATION" state; the ticket is reassigned to the Operations Manager who then moves the process back to Step 5a for re-evaluation by another evaluator	• Tracking records enter this step in "IN CONTENTION SET – AWAITING CONFIRMATION" state with a String Type of ASCII • Tracking records are assigned for a confirmation assessment to a member of the Core Team • Review by the Core Team results in either a confirmation of the Contention Set analysts or a need for re-evaluation of the string • Records leave this step in either the "IN CONTENTION SET – CONFIRMED" state or the "PASSED INITIAL EVALUATION" state	• Operations Manager assigns the Contention Set assessment the Core Team • Core Team executes the assessment • Reporting by the Core Team results in actions by the Operations Manager

Step	Name	Actions	Tracking	Who
6b	Independent Contention Set Processing for IDN Strings	• The Operations Manager consults with the UCL Liaison to identify a second analyst for string similarity • The UCL Liaison nominates a new string similarity assessor for the string in the tracking record • The UCL Liaison assigns the record to the nominated assessor • The UCL Evaluator executes an independent assessment of the IDN string in the evaluation workbook • If the result of the independent assessment results in a confirmation of the results in step 5b above, the record is placed in the "IN CONTENTION SET – CONFIRMED" state and the ticket is reassigned to the Operations Manager • If the result of the independent assessment results in a confirmation of the contention set, an automatic re-review of the string is completed using the process documented in steps 3, 4 and 5 • If the result of the independent evaluation results in no confirmation or a question about the contention set, the ticket is placed in "PASSED INITIAL EVALUATION" state; the record is reassigned to the Operations Manager who then moves the process back to Step 5b for re-evaluation by another evaluator – the very few (if any) cases where this loop takes place are monitored by the Operations Manager	• Tracking records enter this step in "IN CONTENTION SET – AWAITING CONFIRMATION" state with a String Type of ASCII • Records are assigned for a confirmation assessment to a member of the UCL team as nominated by the UCL Liaison • Review by the UCL Evaluator results in either a confirmation of the Contention Set analysts or a need for re-evaluation of the string • Tracking records leave this step in either the "IN CONTENTION SET – CONFIRMED" state or the "PASSED INITIAL EVALUATION" state	• Operations Manager works with the UCL Liaison to assign the Contention Set analysis to an independent, different member of the UCL team • UCL Evaluator executes the assessment • Reporting by the Core Team results in actions by the Operations Manager

Step	Name	Actions	Tracking	Who
7a	Quality Review for Strings That Pass the Initial Evaluation	• For all tracking records in "PASSED DETAILED EVALUATION" state, the Operations Manager requests the full Core Team to lead a quality review against a standard checklist to ensure consistency in processing. The Operations Manager assigns the tracking record to the Core Team and facilitates the Core Team review. • For strings that have received more than one review with conflicting evaluations, the Core Team may determine to a) send the string for another evaluation, b) defer the decision on the String or c) resolve the conflict so that the string may move to the "PASSED DETAILED EVALUATION" or "IN CONTENTION SET – CONFIRMED" state. • When the Core Team chooses to re-evaluate a string with a conflicting evaluation, the string is placed into step 6a or 6b appropriately. As with the initial re-review, another independent evaluator is assigned the string without knowledge of the initial evaluations. • At the end of the quality review for tickets in "PASSED DETAILED EVALUATION" state, the tracking records are put into either "QUALITY REVIEW COMPLETED – NO CONCERNS NOTED" or the "QUALITY REVIEW COMPLETED – CONCERNS NOTED" state and reassigned to the Operations Manager for re-evaluation	• Tracking records are in one of three states: "FAILED INITIAL EVALUATION," "PASSED DETAILED EVALUATION," or "IN CONTENTION SET – CONFIRMED" • Records are initially owned by the Operations Manager • Tracking records are set with a due date of five working days • Records are assigned to the Core Team for Quality Review • Records change state based on the result of the Quality Review • Records are eventually reassigned to the Operations Manager	• Operations Manager assigns Quality Review to the Core Team • The Operations Manager facilitates the Core Team's Quality Review • The results are documented in the tracking record by the assigned Core Team member and the record is reassigned to the Operations Manager

InterConnect Communications
A Telcordia Technologies Company

Step	Name	Actions	Tracking	Who
7b	Quality Review for Strings That Do Not Pass the Evaluation	• For all tracking records in "FAILED INITIAL EVALUATION" or "IN CONTENTION SET – CONFIRMED" states, the Operations Manager requests the full Core Team to lead a quality review against a standard checklist to ensure consistency in processing. The Operations Manager assigns the tracking record to the Core Team and facilitates the Core Team review. • For strings that have received more than one review with conflicting evaluations, the Core Team may determine to a) send the string for another evaluation, b) defer the decision on the String or c) resolve the conflict so that the string may move to the "PASSED DETAILED EVALUATION" or "IN CONTENTION SET – CONFIRMED" state. • When the Core Team chooses to re-evaluate a string with a conflicting evaluation, the string is placed into step 6a or 6b appropriately. As with the initial re-review, another independent evaluator is assigned the string without knowledge of the initial evaluations. • At the end of the quality review for records in "PASSED DETAILED EVALUATION" state, the records are put into either "QUALITY REVIEW COMPLETED – NO CONCERNS NOTED" or the "QUALITY REVIEW COMPLETED – CONCERNS NOTED" state and reassigned to the Operations Manager	• Tracking records are in one of three states: "FAILED INITIAL EVALUATION," "PASSED DETAILED EVALUATION," or "IN CONTENTION SET – CONFIRMED" • Records are initially owned by the Operations Manager • Tracking records are assigned to the full Core Team (and, possibly, the UCL Liaison) for Quality Review • Records change state based on the result of the Quality Review • Records are eventually reassigned to the Operations Manager	• Operations Manager assigns Quality Review to the full Core Team • The Operations Manager facilitates the Core Team's Quality Review • If IDNs are involved in the ticket, the UCL Liaison participates in the Quality Review • The results are documented in the tracking record by the assigned Core Team member and the record is reassigned to the Operations Manager

INTERCONNECT COMMUNICATIONS
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Step	Name	Actions	Tracking	Who
8	Quality Concerns Resolution	• For records in the state "QUALITY REVIEW COMPLETED – CONCERNS NOTED" the concerns must be addressed and resolved before reporting to ICANN • Operations Manager assigns the record to the full Core Team to resolve the issue • Follow up dialogue between the Core Team and the participants in both the review and the evaluation. All actions taken to resolve Quality Concerns are documented in the tracking record • The Core Team, facilitated by the Operations Manager, can set the state of the record to "QUALITY REVIEW COMPLETED – NO CONCERNS NOTED" as a resolution of the concerns or recommend that the record be fully re-evaluated. This is for Quality Control issues only. • The record is then reassigned to the Operations Manager	• Tracking records come to this step in the "QUALITY REVIEW COMPLETED – CONCERNS NOTED" state • Records are initially owned by the Operations Manager • Records are assigned to the full Core Team, facilitated by the Operations Manager to resolve the Quality or Process Issue • The record is returned to the Operations Manager in a resolved state or with a recommendation of full re-review.	• Tickets are passed to an independent Core Team member for assessment and resolution of the Quality Concerns • The ticket is then acted upon by the assigned Core Team Member and returned to the Operations Manager
9	Variant Analysis and Reporting	• Operations Manager makes any required, standardized additions to the tracking record • Operations Manager works with the UCL Liaison to perform the analysis against the IDN Variant Tables for all required strings • Operations Manager sets record state to "INTERNAL EVALUATION AND REPORTING COMPLETE" • Tracking records are closed and unavailable for further addition of material (text, tracking or attached files) • Operations Manager transfers the result of the evaluation in the ticket to ICANN's TAS • Operations Manager sets record state to "REPOINTERNAL TRACKING SYSTEMING TO ICANN COMPLETED" • Operations Manager puts the record into "EVALUATION CLOSED" state	• Internal reporting and findings are documented • IDN Variant Analysis is completed as necessary • Reporting to ICANN is completed • Tracking record is closed	• Operations Manager completes the reporting on the tracking record

Step	Name	Actions	Tracking	Who
10	Advice to ICANN	• Operations Manager transfers the result of the evaluation to ICANN's TAS • Operations Manager sets tracking record state to "REPORTING TO ICANN COMPLETED" • Operations Manager reports on contention sets in ICANN's TAS • Operations Manager puts the record into "EVALUATION CLOSED" state	• Reporting to ICANN is completed • Tracking record is closed	

InterConnect Communications
A Telcordia Technologies Company

Annex 9.

Our ref :   fpe/mne/107646.0000003
Your ref :

Flip Petillion
Advocaat
Contact Information Redacted

26 June 2013

ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094
USA
By regular mail and by e-mail: didp@icann.org; reconsideration@icann.org

DIDP Request 20130328-1 and Reconsideration Request

Dear Sirs,

I write you this letter as counsel to Booking.com B.V., the applicant for the gTLD '.hotels' (Application ID 1-1016-75482), (hereinafter 'Booking.com') in response to ICANN's communication of 7 June 2013 that it had posted a process description of the evaluation panels. ICANN accorded Booking.com a 30-day period to amend its Request for Reconsideration of ICANN's decision to put .hotels and .hoteis in a contention set.

The process description lacks an articulated basis for ICANN's decision. Specifically, the generalized information ICANN thus far has provided does not explain a rationale or analysis for the decision to put .hotels and .hoteis in a contention set and, therefore, does not allow Booking.com to appropriately amend its Request for Reconsideration. Considering ICANN's obligations of transparency and accountability as found in its Bylaws and Articles of Incorporation, ICANN must provide additional particularized information, as discussed in further detail below. Booking.com also requests an explanation as to why the posting of the process description of the evaluation panels was delayed.

Indeed, on 27 April 2013, ICANN issued a response to Booking.com's DIDP request, in which ICANN had indicated that it would be posting the SSP's String Similarity Process and Workflow shortly.

On 9 May 2013, we wrote to ICANN noting that it had failed to provide any additional information or address any of Booking.com's concerns as conveyed in its DIDP Request or Request for Reconsideration.

On 14 May 2013, ICANN responded that it intended to post the String Similarity Process and Workflow by 17 May 2013. On 7 June 2013, ICANN finally posted a process description of the String Similarity new gTLD Evaluation Panel (hereinafter, the "Process Description"). ICANN also indicated that, as from the posting of the Process Description, Booking.com had a 30-day period to amend its Request for Reconsideration.

However, the Process Description gives only a general overview of the process of the String Similarity Review Panel. Even through today, ICANN has not given *any* information on how the string similarity review between the .hotels string and other strings was assessed, using this Process (*e.g.*, What visual assessment did the operations manager make in its initial assessment?, How did ICC/UCL evaluators evaluate the .hotels string?, etc.). In other words, ICANN has not provided any particularized rationale or analysis for putting .hotels and .hoteis in a contention set.

Booking.com does not understand why it took ICANN so long to publish a Process Description that merely outlines the general workflow and that does not include any string specific information. This is all the more bizarre given the fact that the Process Description itself indicates that the string similarity evaluation has been documented in so-called evaluation workbooks. Was the string similarity evaluation process designed as specified by the Process Description before the start of the evaluation or has it been adapted over time? If this process was adapted, why was it adapted, how was it adapted and how did it influence the evaluation results? And why was the publication of the Process Description delayed?

Booking.com respectfully requests an answer to these questions along with a detailed overview of how the .hotels string has been evaluated and including a response to the following questions:

- How has the .hotels string been evaluated, according to which criteria (*e.g.*, what was included in the standard checklist to ensure consistency) and by whom?
- What were the qualifications of the project manager, evaluator(s) and core team members that evaluated the .hotels string?
- What did the "evaluation workbook" contain for the .hotels string? Who had access to the "evaluation workbook" for .hotels during the evaluation process?
- What was the advice that the Operations Manager provided to ICANN re .hotels? Did that advice ever change throughout the evaluation process? How and when did ICANN check that the .hotels string evaluation was performed in accordance with the process described in the Process Description?
- The document titled the "String Similarity new gTLD Evaluation Panel -- Process Description" included the heading: "New gTLD Program Evaluation Panels: Geographic Names". Is this the description of the String Similarity Evaluation, or the Geographic Names Evaluation? Is this a mistake, or, were the evaluations combined?

Considering ICANN's obligations of transparency and accountability, there cannot be any "compelling reason for confidentiality." And, as mentioned above, there are numerous compelling reasons for publication of this information. Booking.com cannot appropriately amend its filings until it gains a better understanding of what was decided, why it was decided, by whom it was decided, and in what particular fashion it was decided. Booking.com therefore urges ICANN to publish the requested information.

Booking.com reserves the right to amend its Request for Reconsideration upon receipt of the requested information in due course.

Yours sincerely,

Flip Petillion
Crowell & Moring LLP
Contact Information Redacted

Annex 10.

Response to Documentary Information Disclosure Policy Request

To: Mr. Flip Petillion, Crowell & Moring LLP

Date: 25 July 2013

Re: Follow up to request No. 20130328-1

_____

Thank you for your letter of 26 June 2013, in follow up to your Request for Information dated 28 March 2013 (the "Request"), which was submitted through the Internet Corporation for Assigned Names and Numbers' (ICANN) Documentary Information Disclosure Policy (DIDP). For reference, a copy of your letter is attached to the email forwarding this follow up Response.

Items Requested

The follow up seeks the following items of information:

"Was the string similarity evaluation process designed as specified by the Process Description before the start of the evaluation or has it been adapted over time? If the process was adapted, why was it adapted, how was it adapted and how did it influence the evaluation results? And why was the publication of the Process Description delayed?

"Booking.com respectfully requests an answer to these questions along with a detailed overview of how the .hotels string has been evaluated and including a response to the following questions:

- How has the .hotels string been evaluated, according to which criteria (e.g., what was included in the standard checklist to ensure consistency) and by whom?

- What were the qualifications of the project manager, evaluator(s) and core team members that evaluated the .hotels string?

- What did the "evaluation workbook" contain for the .hotels string? Who had access to the "evaluation workbook" for .hotels during the evaluation process?

- What was the advice that the Operations manger provided to ICANN re .hotels? did that advice ever change throughout the evaluation process? How and when did ICANN check that the .hotels string evaluation was performed in accordance with the process described in the Process Description.

- The document titled the "String Similarity new gTLD Evaluation Panel – Process Description" included the heading: "New gTLD Program Evaluation Panels: Geographic Names." Is this the description of the String Similarity Evaluation, or the geographic Names Evaluation? Is this a mistake, or, were the evaluations combined?

Response

ICANN's DIDP is for requesting documentation within ICANN that is not already publicly available. The DIDP is not for the submission of questions for which narrative responses are sought. ICANN is therefore responding to your Request to the extent that it can be understood to seek documentary information.

As previously explained, an independent String Similarity Panel (SSP), coordinated by InterConnect Communications, in partnership with the University College London, performed the string similarity review specified at Section 2.2.1.1 of the Applicant Guidebook, available at http://newgtlds.icann.org/en/applicants/agb/guidebook-full-04jun12-en.pdf. The Applicant Guidebook sets out detail regarding the string similarity review, including the review methodology.

The evaluation of the .hotels string by the SSP panel was performed according to the SSP process documentation at http://newgtlds.icann.org/en/program-status/evaluation-panels/geo-names-similarity-process-07jun13-en.pdf.[1] The report of the SSP regarding contention sets is already publicly posted at http://newgtlds.icann.org/en/announcements-and-media/announcement-26feb13-en, and the report of the SSP is the only "advice" that ICANN received in regards to .hotels.

The SSP's work was subjected to quality control review, as has been publicly discussed, for example, at pages 21 and 22 of http://dakar42.icann.org/meetings/dakar2011/presentation-new-gtld-program-update-26oct11-en.pdf and page 14 and 15 of http://dakar42.icann.org/meetings/dakar2011/presentation-new-gtld-program-update-26oct11-en.pdf. The quality control review is not performed on a string-by-string basis, but over a sampling of applications.

ICANN's scope of work and selection criteria for the SSP are set forth in the expressions of interest document that is publicly available at http://archive.icann.org/en/topics/new-gtlds/eoi-string-sim-31jul09-en.pdf. InterConnect Communications, in partnership with the University College London, the entities selected to perform the SSP work, were responsible for the compilation of the panel membership as set forth in that selection criteria.

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[1] There is an error in the posted documentation, as the Geographic Names Evaluation is also referenced in the header. However, the referenced documentation is only for the SSP. The Geographic Names Evaluation was performed according to the process available at http://newgtlds.icann.org/en/program-status/evaluation-panels/geo-names-process-07jun13-en.pdf. All of the panels performing reviews in the Initial Evaluation stage had process documentation posted at the same time, and the coordination of that posting among multiple panels contributed to a perceived delay in posting the SSP process documentation.

For the further information that you seek regarding the evaluation or findings for the strings at issue in your Request, or the identification of the specific evaluators, and the evaluation workbook requested in your follow up, that information is subject to the following Defined Conditions for Nondisclosure:

- Internal information that, if disclosed, would or would be likely to compromise the integrity of ICANN's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from ICANN Directors, ICANN Directors' Advisors, ICANN staff, ICANN consultants, ICANN contractors, and ICANN agents.

- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.

- Confidential business information and/or internal policies and procedures.

As much of this Request seeks information similar to that requested initially, all Defined Conditions of Nondisclosure identified in ICANN's initial response are also incorporated herein.

About DIDP

ICANN's DIDP is limited to requests for information already in existence within ICANN that is not publicly available. In addition, the DIDP sets forth Defined Conditions of Nondisclosure. To review a copy of the DIDP, which is contained within the ICANN Accountability & Transparency: Framework and Principles please see http://www.icann.org/en/about/transparency/didp. ICANN makes every effort to be as responsive as possible to the entirety of your Request.

We hope this information is helpful. If you have any further inquiries, please forward them to didp@icann.org.

Annex 11.

18 December 2013

INTERCONNECT COMMUNICATIONS
A Telcordia Technologies Company

Contact Information Redacted

Russ Weinstein
Panel Coordination Manager
ICANN New gTLD Program
ICANN
12025 Waterfront Drive
Suite 300
Los Angeles, CA 90094-2536
USA

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RE: String Similarity Process, Quality Control and Non-Exact Contention Sets

ICANN has previously published the Evaluation Panel Process Documentation for String Similarity at http://newgtlds.icann.org/en/program-status/evaluation-panels

This note provides a summary of the process, quality control mechanisms and some considerations surrounding non-exact contention sets for the string similarity evaluation as requested by ICANN.

1. InterConnect Communications was contracted by ICANN to conduct the string similarity reviewed required by the Applicant Guidebook (AGB). The string similarity reviews were conducted as part of Initial Evaluation (IE) in the new gTLD Program.

2. InterConnect partnered with University College London for linguistic and language expertise. This expertise assisted with the evaluations of IDNs variants as well as ASCII strings. InterConnect had redundant and backup coverage for every applied-for language among all the applied-for strings. The individual evaluators represented a variety of linguistic and professional backgrounds, and included linguists, trade mark attorneys and technical professionals.

3. At the beginning of IE, ICANN assigned all of the applied-for strings, including exact matches, to InterConnect. InterConnect convened an internal "Core Team" whose role was to ensure that the reviews were conducted equally, that quality of the reviews was maintained, conflicts were discovered and dealt with, and that the established process was followed consistently for every string evaluation. The objective of the Core Team was to ensure quality, consistency and fairness across all the string similarity evaluations.

4. A pool of string evaluators was trained to do the individual evaluations. The training consisted of ensuring that the evaluator understood the new gTLD program, the requirements of the String Similarity evaluation and criteria set out in the AGB. Each evaluator went through a conflict of interest process as well as a simulation to assess their readiness to conduct actual reviews.

5. The standard used for string similarity evaluation comes from the AGB: "***String confusion exists where a string so nearly resembles another visually that it is likely to deceive or cause confusion. For the likelihood of confusion to exist, it must be probable, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another string to mind, is insufficient to find a likelihood of confusion.***"

Key features of this standard is that the standard is <u>only about visual confusion</u>, the <u>confusion must be probable and not merely possible</u>, and that a <u>string that brings another string to mind does not meet the standard</u> for a likelihood of confusion. The wording of the test sets the bar for string confusion higher than equivalent tests for "likelihood of confusion" found in, for example, the UDRP or international trademark standards, where factors such as meaning, or phonetic equivalence are included, and therefore excluded all but one of the complex matrix of factors which contribute towards perception (and therefore potential confusion). In interpreting the "average, reasonable Internet user", the evaluators were trained to consider adult users, with no learning or other cognitive difficulties, and who were speakers of the relevant language.   Familiarity with the language or script was a decision made following pilot evaluations which showed that those familiar with a particular language or script tended to yield different results compared with those who were unfamiliar.

6. The panel was also provided a set of SWORD scores for each string. Again, from the AGB: "***The String Similarity Panel is informed in part by an algorithmic score for the visual similarity between each applied-for string and each of other existing and applied-for TLDs and reserved names. The score will provide one objective measure for consideration by the panel, as part of the process of identifying strings likely to result in user confusion. In general, applicants should expect that a higher visual similarity score suggests a higher probability that the application will not pass the String Similarity review. However, it should be noted that the score is only indicative and that the final determination of similarity is entirely up to the Panel's judgment.***"

7. The tests that were done for every string by the String Similarity panel are outlined in 2.2.1.1 of the AGB. They included:

- Applied-for gTLD strings against <u>existing TLDs</u> and <u>reserved names</u>;
- Applied-for gTLD strings against other <u>applied-for gTLD strings</u>;
- Applied-for gTLD strings against <u>strings requested as IDN ccTLDs; and</u>
- Applied-for 2-character IDN gTLD strings against:
  - Every other single character.
  - Any other 2-character ASCII string (to protect possible future ccTLD delegations).
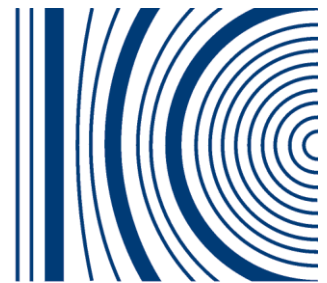
8. For every string assigned by ICANN to InterConnect, a workbook was created that contained the string to be evaluated, the list of reserved strings, the list of existing TLDs, the list of ineligible strings, the full list of applied-for strings, the SWORD scores comparisons that scored over 70 for that string, and an evaluation matrix that collected the data from the individual evaluations and the resulting outcome for the string. After careful consideration by the Core Team the 70 percentile was chosen at a level significantly below that which SWORD and human perception of confusability coincided, in order to limit false positives with numerous gTLD applications. The Core Team bore in mind that the comprehensive pairwise comparison against all applied-for strings ensured that all possibilities were considered by the evaluators.

9. Strings were then assigned to individual evaluators after assessing any potential conflict between an individual evaluator and the string applicant and any organization associated with the string. The individual evaluator used the criteria in item 5, above, to assess similarity. Capital and lower case letters were used and a standard set of typical fonts from modern browsers were examined as part of the evaluation. The evaluators completed the workbook and then returned it to the Core Team for quality control, assessment and reporting.

10. Non-Exact Match Contention Sets. The evaluators were given the training and the AGB criteria, and it was left to their judgment to apply the test. On reviewing the results, it is seen that when *ALL* of the following features of a pairwise comparison are evident the evaluators found the string pair to be confusingly similar.

- Strings of similar visual length on the page
- Strings within +/- 1 character of each other
- Strings where the majority of characters are the same and in the same position in each string
- The two strings possess letter combinations that visually appear similar to other letters in the same position in each string
  - For example rn~m & l~l

11. Any string found to be in contention was immediately reassigned to a second evaluator. The second evaluator did not know that an initial evaluation had been made nor did the second evaluator know the results of the initial evaluation. This process ensured that strings found to be in contention had multiple, independent evaluations.
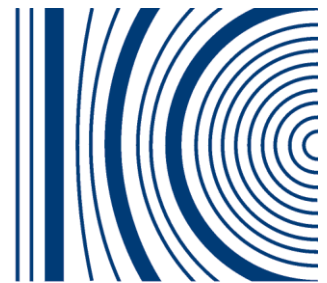
12. If a second string contention evaluation came back to the Core Team with the same results, this was presented to the Core Team for quality control, assessment and reporting. If a second string contention evaluation came back to the Core Team with conflicting results, the string was automatically assigned to a third reviewer. Once again, the third evaluator did not know that an initial and 2nd evaluation had been made nor did the third evaluator know the results of the initial or 2nd evaluation. The Core Team had the liberty to execute as many re-examinations of strings as it needed to get Core Team consensus that the result was ready to report to ICANN.

13. As completed workbooks came back to the Core Team for quality control, assessment and reporting, the Core Team made a decision about whether or not the results of the evaluation were ready to report to ICANN. The Core Team had the option, given any concern that they may have, to either defer reporting or request that a further, independent evaluation be done. This additional evaluation was assigned in the same way as those in contention were assigned: the second evaluator did not know that an initial evaluation had been made nor did the second evaluator know the results of the initial evaluation.

14. The Core Team did not impose its own judgment in the face of consensus amongst evaluators. In situations where evaluators reached different conclusions, the Core Team used the process of careful re-examination by independent evaluators repeatedly. The Core Team had four participants and the result was that, for some strings, as many as eight people did independent reviews of the strings before the Core Team felt prepared to report the results.

15. The Core Team met weekly during IE to process the results of individual evaluations, request re-evaluations, and agree that individual results were ready to report to ICANN. Only after Core Team consensus was reached that the needed level of quality reviews, process consistency, and consistent results were present, were the string similarity results released to be reported to ICANN.

16. The eventual non-exact, confusingly similar strings placed into contention by the panel was small, in part, because this standard (in item 5 and 10 above) is so strong.

Mark McFadden

String Similarity Panel Manager
InterConnect Communications

Annex 12.

crowell moring

Our ref :   fpe/mne/107646.0000001
Your ref :

Flip Petillion
Advocaat
**Contact Information
Redacted**

28 March 2013

To the attention of Mr. Steve Crocker
Chair, ICANN Board
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292
By regular mail and by e-mail: reconsideration@icann.org

Request for Reconsideration the Decisions of February 26, 2013 Materially Affecting Booking.com B.V.

Dear Sir,

Please find attached a Reconsideration Request relating to the Decisions of February 26, 2013, submitted on behalf of Booking.com B.V.

This Reconsideration Request is submitted to you in your capacity of chair of the ICANN Board, within the 30-day window of opportunity to submit such a request.

Despite the fact that the origin of the decisions is somewhat unclear, this Reconsideration Request is being submitted as a reconsideration of a "Staff action." In the event that the decisions referenced above are determined to be a "Board action," this request may be amended.

Yours sincerely,

Flip Petillion
Crowell & Moring LLP
Contact Information Redacted

BOOKING.COM B.V.

Request for Reconsideration of the Decision of February 26, 2013

1.   Requester Information

Name: Booking.com B.V.

Address:

Email:

Phone Number (optional):

C/o:

Name: Flip Petillion, Crowell & Moring LLP

Address:

Email:

Phone Number (optional):

2.   Request for Reconsideration of (check one only):

___ **Board action/inaction**

_X_ **Staff action/inaction**

3.   Description of specific action(s) you are seeking to have reconsidered.

Booking.com B.V. (hereinafter, the 'Requester''') seeks reconsideration of ICANN's decision to place the gTLD application for '.hotels' (Application ID 1-1016-75482) and the gTLD application for '.hoteis' (Application ID 1-1249-87712) in a non-exact match contention set (**Attachment 1**).

Booking.com B.V. also seeks reconsideration of ICANN's decision not to provide a detailed analysis or a reasoned basis for its decision to place the gTLD application for '.hotels' (Application ID 1-1016-75482) and the gTLD application for '.hoteis' (Application ID 1-1249-87712) in a non-exact match contention set.

Both decisions are hereinafter collectively referred to as the 'Decisions'.

4.   Date of action/inaction:

The Decisions were published on February 26, 2013 (**Attachment 1**).

5. **On what date did you became aware of the action or that action would not be taken?**

The Decisions were communicated to the primary contact of the Requester as specified in the Requester's application for the .hotels gTLD ('Primary Contact') on February 26, 2013 (**Attachment 2**). The Requester became aware of the Decisions on February 27, 2013, when the Primary Contact informed the Requester of the Decisions.

6. **Describe how you believe you are materially affected by the action or inaction:**

The Requester is the applicant for the '.hotels' gTLD. The Decisions will impact the Requester because ICANN has made it clear in the Applicant Guidebook that it "will not approve applications for proposed gTLD strings that are identical or that would result in user confusion, called contending strings" (Applicant Guidebook, Module 4-2). ICANN refers to a group of applications for contending strings as a contention set. By placing 'hotels' and 'hoteis' in a non-exact match contention set, ICANN's String Similarity Review Panel apparently determined that these strings would result in user confusion. As a result, ICANN will not approve both the application for 'hotels' and the application for 'hoteis'.

This directly impacts the Requester as follows:

- The Requester will not be allowed to operate a '.hotels' gTLD in the event that the '.hoteis' gTLD is recommended for delegation; and

- If the Requester wants to operate the '.hotels' gTLD, and the '.hoteis' application is not rejected by ICANN, it will need to either negotiate with the Applicant for '.hoteis' or participate at an auction with a view to obtaining the delegation of the '.hoteis' gTLD. Both may require additional investments which are not justified given the reasons why the consideration by ICANN's String Similarity Review Panel is erroneous.

Regarding ICANN's failure to provide a detailed explanation of its decision and the corresponding analysis, Requester is left without actual knowledge about the basis for ICANN's decision to put .hotels into a non-exact match contention set with .hoteis.

7. **Describe how others may be adversely affected by the action or inaction, if you believe that this is a concern.**

The Requester considers that the Decisions also adversely affect others:

- The Applicant for the '.hoteis' gTLD is adversely affected as it will equally not be allowed to operate a '.hoteis' gTLD if a '.hotels' gTLD is recommended;

- Internet users are adversely affected as there may be less competition at a TLD level as well as fewer TLDs targeted at non-English speaking communities (see response to Question 11 below); and

- Without a detailed explanation of the non-exact match contention set decision, the ICANN community is deprived of an understanding of ICANN's reasoning, analysis, and standards when evaluating user confusion.

8.   If you are complaining of an action, are you seeking a temporary stay of the action? (Check one)

____ Yes

_x_ No

The Requester does not believe that a temporary stay is required. Instead, Requester asks that ICANN's decision regarding the non-exact match contention set be reversed. In the alternative, Requester asks that ICANN provide the detailed analysis and reasoning regarding the decision to place .hotels into a non-exact match contention set.

8a.   If Yes, you are seeking a temporary stay, do you believe any harm(s) will occur if the action is not stayed? (Check one)

Not applicable

8b.   If you answered Yes to 8.a., please describe the harm(s) that you believe will occur if the action is not stayed:

Not applicable

9.   Detail of Board or Staff Action – Required Information

At present, it appears that the String Similarity review was likely conducted by a third party, but was then accepted and implemented by ICANN staff. It is unclear whether or not the decision of February 26, 2013 was reviewed by the ICANN Board, although the publicly available information suggests that it was not. In any event, ICANN Staff published the results of the String Similarity review on the ICANN website and communicated the decision to Requester's Primary Contact (**Attachment 1**). As a result, ICANN (Staff) has communicated that ICANN endorsed the decision to put the 'hotels' and 'hoteis' strings in a contention set.

The decision to put 'hotels' and 'hoteis' in a contention set is contrary to ICANN's established policy as set out in the Applicant Guidebook; the failure by ICANN to provide reasoning for the decision is contrary to ICANN's mandate to act transparently and fairly; and it seems likely that the contention set decision was made without all of the material information.

The Applicant Guidebook states:

> "'similar' means strings so similar that they create a probability of user confusion if more than one of the strings is delegated into the root zone.

[...]

The String Similarity Panel will also review the entire pool of applied-for strings to determine whether the strings proposed in any two or more applications are so similar that they would create a probability of user confusion if allowed to coexist in the DNS. The panel will make such a determination for each pair of applied-for gTLD strings. The outcome of the String Similarity review [...] is the identification of contention sets among applications that have direct or indirect contention relationships with one another.

Two strings are in direct contention if they are identical or similar to one another.

[...]

Two strings are in indirect contention if they are both in direct contention with a third string, but not with one another." (**Attachment 2**, Module 4-2, 4-3)

The Applicant Guidebook also states:

*"**Standard for String Confusion** – String confusion exists where a string so nearly resembles another visually that it is likely to deceive or cause confusion. For the likelihood of confusion to exist, it must be probable, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another string to mind, is insufficient to find a likelihood of confusion."* (**Attachment 2**, Module 2-8)

As a result, two strings should only be placed in a contention set to the extent that they are so similar that they create a probability of user confusion if both strings are delegated into the root zone.

For the following reasons, there is no probability of user confusion if both 'hotels' and 'hoteis' were delegated as a gTLD string into the root zone:

- The difference between the letter "i" and the letter "l" clearly distinguishes the 'hotels' and 'hoteis' strings from each other;

- The intended use of the 'hotels' gTLD clearly distinguishes this gTLD from the 'hoteis' gTLD; and

- The Internet user will not be confused between 'hotels' and 'hoteis', irrespective of whether or not the Internet user is requesting information or whether the Internet user is receiving information.

This is further explained below under Question 11.

Because there is no probability of user confusion if both 'hoteis' and 'hotels' were delegated as a gTLD string into the root zone, it is contrary to ICANN's policy to put them in a contention set.

ICANN's Articles of Incorporation require it to act "through open and transparent processes," and its Bylaws further provide that ICANN must "operate to the maximum extent feasible in an open and transparent manner and consistent with

procedures designed to ensure fairness." (Articles of Incorporation, Art. 4; Bylaws, Art. III. sec. 1) The Bylaws also require that ICANN "mak[e] decisions by applying documented policies neutrally and objectively, with integrity and fairness." (Bylaws, Art. I, Sec. 2.8)

ICANN's failure to provide any reasoned decision or analysis in support of putting 'hotels' and 'hoteis' in a contention set is contrary to ICANN's mandate to act transparently, and prevents the Requester and the ICANN community from determining whether the decision was made fairly and in a non-arbitary fashion.

Additionally, given the lack of a reasoned decision or other public information regarding ICANN's string contention analysis and decision, it is impossible to know what information ICANN considered in establishing the contention set (or approving the contention set proposed by an independent contractor). In an attempt to determine what information ICANN Staff considered in making the contention set decision, the Requester has separately submitted a request for information under ICANN's Documentary Information Disclosure Policy. It seems likely that ICANN failed to consider, for example, the information presented in this Request, which is materially related to the contention set decision. At a minimum, the Requester was never given an opportunity to provide information that would refute the mistaken contention that there is likely to be consumer confusion between '.hotels' and '.hoteis'.

10. What are you asking ICANN to do now?

The Requester asks ICANN to reverse the decision in which 'hotels' (Application ID 1-1016-75482) and 'hoteis' (Application ID 1-1249-87712) were put in a non-exact match contention set.

ICANN is requested to decide that the 'hotels' gTLD as applied for in the Application with ID 1-1016-75482 can co-exist with the 'hoteis' gTLD as applied for in the Application with ID 1-1249-87712.

In the event that ICANN will not immediately reverse its decision, the Requester asks that ICANN provide its detailed analysis for the decision to include .hotels into a non-exact match contention set.

11. What grounds or justification support your request?

a) The difference between the letter "i" and the letter "l" clearly distinguishes the 'hotels' and 'hoteis' strings from each other

The difference between the 'hotels' and 'hoteis' strings is grounded in the distinction between the character 'i' and the character 'l'. In linguistic terms, the characters 'i' and 'l' are manifestly distinct.

The Requester asked an independent expert to provide his views on the following questions:

1) Regardless of the ICANN framework, would you consider the 'hotels' and 'hoteis' strings to be confusing?
2) Given the ICANN framework, would you consider both strings visually similar to each other creating a probability of user confusion?

The Requester reserves the right to issue requests to additional experts.

The expert to whom this request was addressed, Professor Piet Desmet, is full professor at the University of Leuven in linguistics and language teaching methodology.

Professor Piet Desmet from the University of Leuven has found that the difference between 'hotels' and 'hoteis' can be reduced to the difference between l and i, which distinguishes both words. The opposition between l and i is clearly distinctive. There are a considerable number of "minimal pairs" in which the l and i alternate, i.e. pairs of words which differ from each other only in the alternation of l and i. These are minimal pairs like candies/candles, eider/elder, fails/falls, mail/mall or wail/wall. So the alternation of l and i in English is distinctive enough to keep words apart solely on the basis of this opposition.

This implies that words that only differ in the alternation of l and i do not confuse the language users visually, as they perfectly distinguish both characters. If this were not the case, the alternation would already have evolved to an alternative that speakers find more distinctive.

Professor Desmet points out that every language consists of a fixed set of phonemes (sounds) and graphemes (letters) that can be combined without limitations. This linguistic reality poses no problems for the language user, who is used to being confronted with words that differ from each other in only one character. This does not prevent the language user from visually distinguishing these words so as to see them as different meaningful entities.

Professor Desmet considers the elements above sufficient to dismiss the idea of string confusion in dealing with minimal pairs that only differ in the alternation of l and i.

Accordingly, '.hotels' and '.hoteis' are not confusingly similar, and the Decision that they should be placed in a contention set is therefore contrary to established ICANN policy. Requester's questions and Professor Desmet's answers are submitted as

Attachment 3 and Attachment 4, respectively.

b) The intended use of the 'hotels' gTLD clearly distinguishes this gTLD from the 'hoteis' gTLD

Both the Applicant for the 'hotels' gTLD and the Applicant for the '.hoteis' gTLD intend to use the applied-for gTLD in a very controlled and restricted way. Both gTLDs will be operated as single-registrant gTLDs. The Applicant for 'hotels' targets different language communities than the Applicant for 'hoteis'. The 'hotels' gTLD is targeted to English-speaking, Dutch-speaking and/or French-speaking communities, whereas the 'hoteis' gTLD is targeted to the Portuguese language community.

Given this clear distinction in target groups and the restricted and controlled use in both gTLDs, the 'hotels' and 'hoteis' gTLDs even become more distinct from each other. As a result, there is no likelihood that the Internet user will be confused, and ICANN's decision to place them in a contention set is contrary to established ICANN policy.

c) The Internet user will not be confused

As seen above, 'hotels' and 'hoteis' are clearly distinct from each other. As a result, an Internet user searching for information on hotels in English, French or Dutch would not mix up the search term 'hotels' with the Portuguese term 'hoteis' because the word 'hoteis' does not exist in the English language. The same is true for an Internet user searching for information on hotels in Portuguese. The user would not mix up the search term 'hoteis' with the English term 'hotels', the word 'hotels' being non-existent in Portuguese.

It is also extremely unlikely that the Internet user would make a typographical error when searching for 'hotels', which would replace 'hotels' by 'hoteis', or vica versa.

The letter 'l' and the letter 'i' are located on a completely different key of a computer keyboard, whether qwerty, azerty or qwertz. Even in the very unlikely event that such error is made by an Internet user searching in English, such Internet user will immediately notice that an error has occurred because the information on 'hoteis' would be in Portuguese.

The same would be true for an Internet user looking for 'hoteis'. First, the word 'hotels' is non-existent in the Portuguese language. As a result, an Internet user looking for information on hotels in Portuguese would not confuse 'hoteis' with the English word. Second, the Internet user would not make a typographical error when searching for 'hoteis', which would replace 'hoteis' by 'hotels'. Finally, in the unlikely event that this typographical error is made, a Portuguese-speaking Internet user would also immediately notice that an error has occurred because the information on 'hotels' would not be in Portuguese.

As a result, the Internet user would not be confused; all of the above factors demonstrate that ICANN's decision to place '.hoteis' and '.hotels' in contention is contrary to established policy. Nor is it clear whether ICANN considered any of the

above material in determining wheter '.hotels' and '.hoteis' were confusingly similar. As a result, Requester asks that ICANN reverse the decision to place .hotels in a non-exact match contention set.

12. Do you have any documents you want to provide to ICANN?

If you do, please attach those documents to the email forwarding this request. Note that all documents provided, including this Request, will be publicly posted at http://www.icann.org/en/committees/board-governance/requests-for-reconsideration-en.htm.

The Requester wishes to submit the following documents in support of its request:

Attachment 1:	Decision to place 'hotels' (Application ID 1-1016-75482) and 'hoteis' (Application ID 1-1249-87712) in a non-exact match contention set.
Attachment 2:	Applicant Guidebook (Version 2012-06-04).
Attachment 3:	Mail from Flip Petillion to Prof. Dr. Piet Desmet of March 21, 2013.
Attachment 4:	Mail from Prof. Dr. Piet Desmet to Flip Petillion of March 22, 2013.

The Requester also may submit additional documents not yet available, such as other expert reports and analyses, in support of its Request. The Requester therefore requests that ICANN allow the submission of these documents when they become available.

*

Annex 13.

crowell ◖moring

Flip Petillion
Advocaat
Contact Information Redacted

7 July 2013

To the attention of Mr. Steve Crocker and Mr. Cherine Chalaby
Chair, ICANN Board *resp.* Chair, New gTLD Program Committee

4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292
By regular mail and by e-mail: reconsideration@icann.org

Request for Reconsideration the Decisions of February 26, 2013 Materially Affecting Booking.com B.V.

Dear Sirs,

Please find attached an amended Reconsideration Request relating to the Decisions of February 26, 2013, submitted on behalf of Booking.com B.V. ('Booking.com')

The original Reconsideration Request was submitted to Mr. Crocker in his capacity as Chair of the ICANN Board, within the 30-day window of opportunity to submit such a request. The amended Reconsideration Request is filed within the 30-day window of opportunity granted by ICANN following the posting of the process description of the String Similarity new gTLD Evaluation Panel on 7 June 2013.

Despite the fact that the origin of the decisions is unclear, this Reconsideration Request is being submitted as a reconsideration of a "Staff action." In the event that the decisions referenced above are determined to be a "Board action," this request may be amended.

Reference is also made to our letters of 9 May 2013 and 26 June 2013, in which we had indicated that ICANN had failed to provide additional information or address any of Booking.com's concerns in a way that allows Booking.com to appropriately amend its Request for Reconsideration.

Because our request to publish additional information remains unanswered and because ICANN did not provide any information that the 30-day window following its communication of 7 June 2013 would be extended, Booking.com has decided to file this amended Reconsideration Request.

*

Booking.com reserves the right to further amend its Request for Reconsideration upon receipt of the information it previously requested and urges ICANN to publish the requested information as specified in our letter of 26 June 2013.

Yours sincerely,

Flip Petillion
Crowell & Moring LLP
Contact Information Redacted

BOOKING.COM B.V.

Request for Reconsideration of the Decision of February 26, 2013

1.   Requester Information

Name: Booking.com B.V.

Address: Contact Information Redacted

Email: Contact Information Redacted

Phone Number (optional):

C/o:

Name: Flip Petillion, Crowell & Moring LLP

Address: Contact Information
                   Redacted

Email: Contact Information
                   Redacted

Phone Number (optional): Contact
                                          Information

2.   Request for Reconsideration of (check one only):

___ Board action/inaction

_X_ Staff action/inaction

3.   Description of specific action(s) you are seeking to have reconsidered.

Booking.com B.V. (hereinafter, the 'Requester'") seeks reconsideration of ICANN's decision to place the gTLD application for '.hotels' (Application ID 1-1016-75482) and the gTLD application for '.hoteis' (Application ID 1-1249-87712) in a non-exact match contention set (**Attachment 1**).

Booking.com B.V. also seeks reconsideration of ICANN's decision not to provide a detailed analysis or a reasoned basis for its decision to place the gTLD application for '.hotels' (Application ID 1-1016-75482) and the gTLD application for '.hoteis' (Application ID 1-1249-87712) in a non-exact match contention set.

Both decisions are hereinafter collectively referred to as the 'Decisions'.

4.   Date of action/inaction:

The Decisions were published on February 26, 2013 (**Attachment 1**).

5. **On what date did you became aware of the action or that action would not be taken?**

The Decisions were communicated to the primary contact of the Requester as specified in the Requester's application for the .hotels gTLD ('Primary Contact') on February 26, 2013 (**Attachment 2**). The Requester became aware of the Decisions on February 27, 2013, when the Primary Contact informed the Requester of the Decisions.

6. **Describe how you believe you are materially affected by the action or inaction:**

The Requester is the applicant for the '.hotels' gTLD. The Decisions will impact the Requester because ICANN has made it clear in the Applicant Guidebook that it "will not approve applications for proposed gTLD strings that are identical or that would result in user confusion, called contending strings" (Applicant Guidebook, Module 4-2). ICANN refers to a group of applications for contending strings as a contention set. By placing 'hotels' and 'hoteis' in a non-exact match contention set, ICANN's String Similarity Review Panel apparently determined that these strings would result in user confusion. As a result, ICANN will not approve both the application for 'hotels' and the application for 'hoteis'.

This directly impacts the Requester as follows:

- The Requester will not be allowed to operate a '.hotels' gTLD in the event that the '.hoteis' gTLD is recommended for delegation; and

- If the Requester wants to operate the '.hotels' gTLD, and the '.hoteis' application is not rejected by ICANN, it will need to either negotiate with the Applicant for '.hoteis' or participate in an auction with a view to obtaining the delegation of the '.hotels' gTLD. Both may require additional investments that are not justified given the erroneous decision by ICANN's String Similarity Review Panel.

Regarding ICANN's failure to provide a detailed explanation of its decision and the corresponding analysis, Requester is left without actual knowledge of the basis for ICANN's decision to put .hotels into a non-exact match contention set with .hoteis.

7. **Describe how others may be adversely affected by the action or inaction, if you believe that this is a concern.**

The Requester considers that the Decisions also adversely affect others:

- The Applicant for the '.hoteis' gTLD is adversely affected as it will equally not be allowed to operate a '.hoteis' gTLD if a '.hotels' gTLD is recommended;

- Internet users are adversely affected as there may be less competition at a TLD level as well as fewer TLDs targeted at non-English speaking communities (see response to Question 11 below); and

- Without a detailed explanation of the non-exact match contention set decision, the ICANN community is deprived of an understanding of ICANN's reasoning, analysis, and standards when evaluating user confusion.

8. **If you are complaining of an action, are you seeking a temporary stay of the action?** (Check one)

____ Yes

_x__ No

The Requester does not believe that a temporary stay is required. Instead, Requester asks that ICANN's decision regarding the non-exact match contention set be reversed. In the alternative, Requester asks that ICANN provide the detailed analysis and reasoning regarding the decision to place .hotels into a non-exact match contention set.

8a. **If Yes, you are seeking a temporary stay, do you believe any harm(s) will occur if the action is not stayed?** (Check one)

Not applicable

8b. **If you answered Yes to 8.a., please describe the harm(s) that you believe will occur if the action is not stayed:**

Not applicable

9. **Detail of Board or Staff Action – Required Information**

At present, it appears that the String Similarity review was likely conducted by a third party, but was then accepted and implemented by ICANN staff. It is unclear whether or not the decision of February 26, 2013 was reviewed by the ICANN Board, although the publicly available information suggests that it was not. In any event, ICANN Staff published the results of the String Similarity review on the ICANN website and communicated the decision to Requester's Primary Contact (**Attachment 1**). As a result, ICANN (Staff) has communicated that ICANN endorsed the decision to put the 'hotels' and 'hoteis' strings in a contention set. This is also confirmed by the process description of the String Similarity new gTLD Evaluation Panel (hereinafter, the 'Process Description'), which ICANN published on 7 June 2013. Indeed, the last step of the process described in this Process Description, which is entitled "Advice to ICANN", clearly indicating that the Evaluation Panel only provided advice to ICANN and that ICANN made the ultimate decision. This is confirmed by two recent Resolutions of the New gTLD Program Committee (NGPC):

- In Resolution 2013.06.04.NG01 (**Attachment 6**), the NGPC accepted the GAC Advice to consider whether to allow singular and plural versions of the same string;

- In Resolution 2013.06.25.NG07 (**Attachement 7**), the NGPC determined that no changes were needed to the existing mechanisms in the Applicant Guidebook to address potential consumer confusion resulting from allowing singular and plural versions of the same string.

These Resolutions indicate that ICANN first considered both the advice from the String Similarity new gTLD Evaluation Panel and the advice from the GAC in relation to string similarity and ultimately made the decision to put applied-for strings in a contention set or not.

The decision to put 'hotels' and 'hoteis' in a contention set is contrary to ICANN's established policy as set out in the Applicant Guidebook; the failure by ICANN to provide reasoning for the decision is contrary to ICANN's mandate to act transparently and fairly; and it seems likely that the contention set decision was made without all of the material information.

The Applicant Guidebook states:

> "*'similar' means strings so similar that they create a probability of user confusion if more than one of the strings is delegated into the root zone.*
>
> *[...]*
>
> *The String Similarity Panel will also review the entire pool of applied-for strings to determine whether the strings proposed in any two or more applications are so similar that they would create a probability of user confusion if allowed to coexist in the DNS. The panel will make such a determination for each pair of applied-for gTLD strings. The outcome of the String Similarity review [...] is the identification of contention sets among applications that have direct or indirect contention relationships with one another.*
>
> *Two strings are in direct contention if they are identical or similar to one another.*
>
> *[...]*
>
> *Two strings are in indirect contention if they are both in direct contention with a third string, but not with one another.*" (**Attachment 2**, Module 4-2, 4-3)

The Applicant Guidebook also states:

> "**Standard for String Confusion** – *String confusion exists where a string so nearly resembles another visually that it is likely to deceive or cause confusion. For the likelihood of confusion to exist, it must be probable, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another string to mind, is insufficient to find a likelihood of confusion.*" (**Attachment 2**, Module 2-8)

As a result, two strings should only be placed in a contention set to the extent that they are so similar that they create a probability of user confusion if both strings are delegated into the root zone.

For the following reasons, there is no probability of user confusion if both 'hotels'

and 'hoteis' were delegated as a gTLD string into the root zone:

- The difference between the letter "i" and the letter "l" clearly distinguishes the 'hotels' and 'hoteis' strings from each other;

- The intended use of the 'hotels' gTLD clearly distinguishes this gTLD from the 'hoteis' gTLD; and

- The Internet user will not be confused between 'hotels' and 'hoteis', irrespective of whether or not the Internet user is requesting information or whether the Internet user is receiving information.

This is further explained below under Question 11.

Because there is no probability of user confusion if both 'hoteis' and 'hotels' were delegated as a gTLD string into the root zone, it is contrary to ICANN's policy to put them in a contention set.

ICANN's Articles of Incorporation require it to act "through open and transparent processes," and its Bylaws further provide that ICANN must "operate to the maximum extent feasible in an open and transparent manner and consistent with procedures designed to ensure fairness." (Articles of Incorporation, Art. 4; Bylaws, Art. III. sec. 1) The Bylaws also require that ICANN "mak[e] decisions by applying documented policies neutrally and objectively, with integrity and fairness." (Bylaws, Art. I, Sec. 2.8). ICANN's Bylaws also prohibit discriminatory treatment, "ICANN shall not apply its standards, policies, procedures, or practices inequitably or single out any particular party for disparate treatment . . . " (Bylaws, Art. II., Sec. 3).

ICANN's failure to provide any reasoned decision or analysis in support of putting 'hotels' and 'hoteis' in a contention set is contrary to ICANN's mandate to act transparently, and prevents the Requester and the ICANN community from determining whether the decision was made fairly and in a non-arbitrary and non-discriminatory fashion.

Additionally, given the lack of a reasoned decision or other public information regarding ICANN's string contention analysis and decision, it is impossible to know what information ICANN considered in establishing the contention set (or approving the contention set proposed by an independent contractor). In an attempt to determine what information ICANN Staff considered in making the contention set decision, the Requester had separately submitted a request for information under ICANN's Documentary Information Disclosure Policy. It seems likely that ICANN failed to consider, for example, the information presented in this Request, which is materially related to the contention set decision. At a minimum, the Requester was never given an opportunity to provide information that would refute the mistaken contention that there is likely to be consumer confusion between '.hotels' and '.hoteis'.

In 27 April 2013, ICANN issued a response to the Requester's DIDP request. ICANN stated that an independent String Similarity Panel (SSP) performed the string similarity review and that the SSP was responsible for the development of its own

process documentation and methodology for performing the string similarity review. ICANN declared that many of the items that are sought from ICANN in the DIDP Request are not in existence within ICANN and cannot be provided in response to the DIDP Request. Nonetheless, ICANN indicated that it would be posting the SSP's String Similarity Process and Workflow shortly.

On 9 May 2013, the Requester wrote to ICANN noting that it had failed to provide any additional information or address any of the Requester's concerns as conveyed in its DIDP Request or Request for Reconsideration. Indeed, as demonstrated above, ICANN received the advice from the SSP on which it based its decision to put '.hotels' and '.hoteis' in a contention set. Stating that ICANN does not have many of the items sought within the DIDP request is not a reason for ICANN to disregard its obligations under ICANN's Articles of Incorporation and Bylaws and to disregard its obligation to provide a reasoned decision or analysis for putting '.hotels' and '.hoteis' in a contention set.

On 14 May 2013, ICANN responded that it intended to post the String Similarity Process and Workflow by 17 May 2013. On 7 June 2013, ICANN finally posted a process description of the String Similarity new gTLD Evaluation Panel (**Attachment 5**, hereinafter, the "Process Description"). ICANN also indicated that, as from the posting of the Process Description, the Requester had a 30-day period to amend its Request for Reconsideration.

On 26 June 2013, the Requester wrote to ICANN that the Process Description did not satisfy its request. On 3 July 2013, ICANN informed the Requester that it received this letter and that it is preparing a response. The Requester has not yet received an answer to its request, as formulated in its letter of 26 June 2013.

As indicated in the Requester's letter of 26 June 2013, the Process Description only gives a general overview of the process of the String Similarity Review Panel. Even through today, ICANN has not given *any* information on how the string similarity review between the .hotels string and other strings was assessed, using this Process (*e.g.*, What visual assessment did the operations manager make in its initial assessment?, How did ICC/UCL evaluators evaluate the .hotels string?, etc.). In other words, ICANN has not provided any particularized rationale or analysis for putting .hotels and .hoteis in a contention set.

The Requester does not understand why it took ICANN so long to publish a Process Description that merely outlines the general workflow and that does not include any string specific information. This is all the more bizarre given the fact that the Process Description itself indicates that the string similarity evaluation has been documented in so-called evaluation workbooks. Was the string similarity evaluation process designed as specified by the Process Description before the start of the evaluation or has it been adapted over time? If this process was adapted, why was it adapted, how was it adapted and how did it influence the evaluation results? And why was the publication of the Process Description delayed?

The Requester requested an answer to these questions along with a detailed overview of how the .hotels string has been evaluated and including a response to the following questions – a request that remains pending – :

- How has the .hotels string been evaluated, according to which criteria (*e.g.*,

what was included in the standard checklist to ensure consistency) and by whom specifically?

- What were the qualifications of the project manager, evaluator(s) and core team members that evaluated the .hotels string?

- What did the "evaluation workbook" contain for the .hotels string? Who had access to the "evaluation workbook" for .hotels during the evaluation process?

- What was the advice that the Operations Manager provided to ICANN re .hotels? Did that advice ever change throughout the evaluation process? How and when did ICANN check that the .hotels string evaluation was performed in accordance with the process described in the Process Description?

- The document titled the "String Similarity new gTLD Evaluation Panel -- Process Description" included the heading: "New gTLD Program Evaluation Panels: Geographic Names". Is this the description of the String Similarity Evaluation, or the Geographic Names Evaluation? Is this a mistake, or, were the evaluations combined?

Considering ICANN's obligations of transparency and accountability, there cannot be any "compelling reason for confidentiality." And, as mentioned above, there are numerous compelling reasons for publication of this information.

As indicated in the Requester's letter of 26 June 2013, the Requester cannot appropriately amend its filings until it gains a better understanding of what was decided, why it was decided, by whom it was decided, and in what particular fashion it was decided.

As ICANN has not yet replied to this request and given the imposed deadline to amend the Request for Reconsideration within 30 days following the posting of the Process Description, the Requester decided filing an amended Request for Reconsideration within this deadline. However, the Requester still urges ICANN to publish the requested information and reserves the right to amend its Request for Reconsideration upon receipt of the requested information.

10. What are you asking ICANN to do now?

The Requester asks ICANN to reverse the decision in which 'hotels' (Application ID 1-1016-75482) and 'hoteis' (Application ID 1-1249-87712) were put in a non-exact match contention set.

ICANN is requested to decide that the 'hotels' gTLD as applied for in the Application with ID 1-1016-75482 can co-exist with the 'hoteis' gTLD as applied for in the Application with ID 1-1249-87712.

In the event that ICANN will not immediately reverse its decision, the Requester asks that ICANN provide its detailed analysis for the decision to include .hotels into a non-exact match contention set and to give the Requester the opportunity to respond to this, before taking a final decision.

11.   What grounds or justification support your request?

a) The difference between the letter "i" and the letter "l" clearly distinguishes the 'hotels' and 'hoteis' strings from each other

The difference between the 'hotels' and 'hoteis' strings is grounded in the distinction between the character 'i' and the character 'l'. In linguistic terms, the characters 'i' and 'l' are manifestly distinct.

The Requester asked an independent expert to provide his views on the following questions:

1) Regardless of the ICANN framework, would you consider the 'hotels' and 'hoteis' strings to be confusing?
2) Given the ICANN framework, would you consider both strings visually similar to each other creating a probability of user confusion?

The Requester reserves the right to issue requests to additional experts.

The expert to whom this request was addressed, Professor Piet Desmet, is full professor at the University of Leuven in linguistics and language teaching methodology.

Professor Piet Desmet from the University of Leuven has found that the difference between 'hotels' and 'hoteis' can be reduced to the difference between l and i, which distinguishes both words. The opposition between l and i is clearly distinctive. There are a considerable number of "minimal pairs" in which the l and i alternate, i.e. pairs of words which differ from each other only in the alternation of l and i. These are minimal pairs like candies/candles, eider/elder, fails/falls, mail/mall or wail/wall. So the alternation of l and i in English is distinctive enough to keep words apart solely on the basis of this opposition.

This implies that words that only differ in the alternation of l and i do not confuse the language users visually, as they perfectly distinguish both characters. If this were not the case, the alternation would already have evolved to an alternative that speakers find more distinctive.

Professor Desmet points out that every language consists of a fixed set of phonemes (sounds) and graphemes (letters) that can be combined without limitations. This linguistic reality poses no problems for the language user, who is used to being confronted with words that differ from each other in only one character. This does not prevent the language user from visually distinguishing these words so as to see them as different meaningful entities.

Professor Desmet considers the elements above sufficient to dismiss the idea of string confusion in dealing with minimal pairs that only differ in the alternation of l and i.

Accordingly, '.hotels' and '.hoteis' are not confusingly similar, and the Decision that they should be placed in a contention set is therefore contrary to established ICANN policy. Requester's questions and Professor Desmet's answers are submitted as

Attachment 3 and Attachment 4, respectively.

b) The intended use of the 'hotels' gTLD clearly distinguishes this gTLD from the 'hoteis' gTLD

Both the Applicant for the 'hotels' gTLD and the Applicant for the '.hoteis' gTLD intend to use the applied-for gTLD in a very controlled and restricted way. Both gTLDs will be operated as single-registrant gTLDs. The Applicant for 'hotels' targets different language communities than the Applicant for 'hoteis'. The 'hotels' gTLD is targeted to English-speaking, Dutch-speaking and/or French-speaking communities, whereas the 'hoteis' gTLD is targeted to the Portuguese language community.

Given this clear distinction in target groups and the restricted and controlled use in both gTLDs, the 'hotels' and 'hoteis' gTLDs even become more distinct from each other. As a result, there is no likelihood that the Internet user will be confused, and ICANN's decision to place them in a contention set is contrary to established ICANN policy.

c) The Internet user will not be confused

As seen above, 'hotels' and 'hoteis' are clearly distinct from each other. As a result, an Internet user searching for information on hotels in English, French or Dutch would not mix up the search term 'hotels' with the Portuguese term 'hoteis' because the word 'hoteis' does not exist in the English language. The same is true for an Internet user searching for information on hotels in Portuguese. The user would not mix up the search term 'hoteis' with the English term 'hotels', the word 'hotels' being non-existent in Portuguese.

As indicated above, the difference between the 'hotels' and 'hoteis' strings is grounded in the distinction between the character 'i' and the character 'l', which are manifestly different from a linguistic point of view.

The Internet user has experience with the difference between the characters 'i' and 'l', also at a TLD level. Indeed, many TLDs that only differ by the substitution of the character 'i' by the character 'l' currently coexist, without any problem:

- .'gi' coexists with '.gl'

- '.ai' coexists with .'al'

- '.lt' coexists with '.it' (**Attachment 8**).

The Internet user also has experience with the coexistence between the TLDs '.il' and '.li', where the characters 'i' and 'l' are interchanged. There is no reason to assume that the Internet user would be confused by '.hotels' and '.hoteis', especially given the fact that the Internet user is already used to the difference between the characters 'i' and 'l' at a TLD level for many years.

It is also extremely unlikely that the Internet user would make a typographical error when searching for 'hotels', which would replace 'hotels' by 'hoteis', or *vice versa*.

The letter 'l' and the letter 'i' are located on a completely different location on a computer keyboard, whether qwerty, azerty or qwertz. Even in the very unlikely event that such error is made by an Internet user searching in English, such Internet user will immediately notice that an error has occurred because the information on 'hoteis' would be in Portuguese.

The same would be true for an Internet user looking for 'hoteis'. First, the word 'hotels' is non-existent in the Portuguese language. As a result, an Internet user looking for information on hotels in Portuguese would not confuse 'hoteis' with the English word. Second, the Internet user would not make a typographical error when searching for 'hoteis', which would replace 'hoteis' by 'hotels'. Finally, in the unlikely event that this typographical error is made, a Portuguese-speaking Internet user would also immediately notice that an error has occurred because the information on 'hotels' would not be in Portuguese.

As a result, the Internet user would not be confused; all of the above analysis demonstrates that ICANN's decision to place '.hoteis' and '.hotels' in contention is contrary to established policy. Nor is it clear whether ICANN considered any of the above material in determining wheter '.hotels' and '.hoteis' were confusingly similar. As a result, Requester asks that ICANN reverse the decision to place .hotels in a non-exact match contention set.

12.   Do you have any documents you want to provide to ICANN?

If you do, please attach those documents to the email forwarding this request. Note that all documents provided, including this Request, will be publicly posted at http://www.icann.org/en/committees/board-governance/requests-for-reconsideration-en.htm.

The Requester wishes to submit the following documents in support of its request:

Attachment 1:   Decision to place 'hotels' (Application ID 1-1016-75482) and 'hoteis' (Application ID 1-1249-87712) in a non-exact match contention set.

Attachment 2:   Applicant Guidebook (Version 2012-06-04).

Attachment 3:   Mail from Flip Petillion to Prof. Dr. Piet Desmet of March 21, 2013.

Attachment 4:   Mail from Prof. Dr. Piet Desmet to Flip Petillion of March 22, 2013.

Attachment 5:   Process description of the String Similarity new gTLD Evaluation Panel as published on June 7, 2013.

Attachment 6:   ICANN Resolution 2013.06.04 NG01, inclusive of its Annex

Attachment 7:   ICANN Resolution 2013.06.25 NG07

Attachment 8:   List of all currently existing TLDs, as delegated by IANA

The Requester also may submit additional documents not yet available, such as other

expert reports and analyses, in relation to the rationale that ICANN is requested to provide concerning its decision to put '.hotels' and '.hoteis' in a contention set. The Requester therefore requests that ICANN allow the submission of these documents when they become available.

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Annex 14.

RECOMMENDATION

OF THE BOARD GOVERNANCE COMMITTEE (BGC)

RECONSIDERATION REQUEST 13-5

1 AUGUST 2013[1]

On 7 July 2013, Booking.com B.V. ("Booking.com"), through its counsel, Crowell &

Moring, submitted a reconsideration request ("Request"). The Request was revised from

Booking.com's 28 March 2013 submission of a similar reconsideration request, which was put

on hold pending the completion of a request pursuant to ICANN's Documentary Information

Disclosure Policy ("DIDP").

The Request asked the Board to reconsider the ICANN staff action of 26 February 2013,

when the results of the String Similarity Panel were posted for the New gTLD Program.

Specifically, the Request seeks reconsideration of the placement of the applications for .hotels

and .hoteis into a string similarity contention set.

I.   Relevant Bylaws

As the Request is deemed filed as of the original 28 March 2013 submission, this Request

was submitted and should be evaluated under the Bylaws that were in effect from 20 December

2012 through 10 April 2013. Article IV, Section 2.2 of that version of ICANN's Bylaws states

in relevant part that any entity may submit a request for reconsideration or review of an ICANN

action or inaction to the extent that it has been adversely affected by:

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[1] At its 1 August 2013 meeting, the Board Governance Committee deliberated and
reached a decision regarding this Recommendation. During the discussion, however, the BGC
noted revisions that were required to the draft Recommendation in order to align with the BGC's
decision. After revision and allowing for the BGC member review, the BGC Recommendation
on Request 13-5 was finalized and submitted for posting on 21 August 2013.

(a) one or more staff actions or inactions that contradict established
ICANN policy(ies); or

(b) one or more actions or inactions of the ICANN Board that have
been taken or refused to be taken without consideration of material
information, except where the party submitting the request could
have submitted, but did not submit, the information for the Board's
consideration at the time of action or refusal to act.

A third criteria was added to the Bylaws effective 11 April 2013, following the Board's

adoption of expert recommendations for revisions to the Reconsideration process. That third

basis for reconsideration, focusing on Board rather than staff conduct, is "one or more actions or

inactions of the ICANN Board that are taken as a result of the Board's reliance on false or

inaccurate material information." (See http://www.icann.org/en/about/governance/bylaws#IV.)

When challenging a staff action or inaction, a request must contain, among other things, a

detailed explanation of the facts as presented to the staff and the reasons why the staff's action or

inaction was inconsistent with established ICANN policy(ies). See Article IV §2.6(g) of the 20

December 2012 version of Bylaws (http://www.icann.org/en/about/governance/bylaws/bylaws-

20dec12-en.htm#IV) and the current Reconsideration form effective as of 11 April 2013

(http://www.icann.org/en/groups/board/governance/reconsideration/request-form-11apr13-

en.doc).

Dismissal of a request for reconsideration is appropriate if the Board Governance

Committee ("BGC") finds that the requesting party does not have standing because the party

failed to satisfy the criteria set forth in the Bylaws. These standing requirements are intended to

protect the reconsideration process from abuse and to ensure that it is not used as a mechanism

simply to challenge an action with which someone disagrees, but that it is limited to situations

where the staff acted in contravention of established policies.

The Request was originally received on 28 March 2013, which makes it timely under the then effective Bylaws.[2] Bylaws, Art. IV, § 2.5.

II.   Background

Within the New gTLD Program, every applied-for string has been subjected to the String Similarity Review set out at Section 2.2.1.1 of the Applicant Guidebook. The String Similarity Review checks each applied-for string against existing TLDs, reserved names and other applied-for TLD strings (among other items) for "visual string similarities that would create a probability of user confusion." (Applicant Guidebook, Section 2.2.1.1.1.) If applied-for strings are determined to be visually identical or similar to each other, the strings will be placed in a contention set, which is then resolved pursuant to the contention resolution processes in Module 4 of the Applicant Guidebook. If a contention set is created, only one of the strings within that contention set may ultimately be approved for delegation.

After issuing a request for proposals, ICANN selected InterConnect Communications ("ICC") to perform the string similarity review called for in the Applicant Guidebook. On 26 February 2013, ICANN posted ICC's report, which included two non-exact match contention sets (.hotels/.hoteis and .unicorn/.unicom) as well as 230 exact match contention sets. http://www.icann.org/en/news/announcements/announcement-26feb13-en.htm. The String Similarity Review was performed in accordance with process documentation posted at http://newgtlds.icann.org/en/program-status/evaluation-panels/geo-names-similarity-process-07jun13-en.pdf. As part of ICANN's acceptance of the ICC's results, a quality assurance review

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[2] ICANN staff and the requester communicated regarding the holds placed on the Request pending the DIDP Response, and the requester met all agreed-upon deadlines, thereby maintaining the timely status of this Request.

was performed over a random sampling of applications to, among other things, test whether the process referenced above was followed.

Booking.com is an applicant for the .hotels string. As a result of being placed in a contention set, .hotels and .hoteis cannot both proceed to delegation. Booking.com will have to resort to private negotiations with the applicant for .hoteis, or proceed to an auction to resolve the contention issue. Request, page 4.

Although the String Similarity Review was performed by a third party, ICANN has determined that the Reconsideration process can properly be invoked for challenges of the third party's decisions where it can be stated that either the vendor failed to follow its process in reaching the decision, or that ICANN staff failed to follow its process in accepting that decision. Because the basis for the Request is not Board conduct, regardless of whether the 20 December 2012 version, or the 11 April 2013 version, of the Reconsideration Bylaws is operative, the BGC's analysis and recommendation below would not change.

III.   Analysis of Booking.com's Request for Reconsideration

Booking.com seeks reconsideration and reversal of the decision to place .hotels and .hoteis in a non-exact match contention set. Alternatively, Booking.com requests that an outcome of the Reconsideration process could be to provide "detailed analysis and reasoning regarding the decision to place .hotels into a non-exact match contention set" so that Booking.com may "respond" before ICANN takes a "final decision." (Request, Page 9.)

A.   Booking.com's Arguments of Non-Confusability Do Not Demonstrate Process Violations

The main focus of Booking.com's Request is that .hotels and .hoteis can co-exist in the root zone without concern of confusability. (Request, pages 10 – 12.) To support this assertion, Booking.com cites to the opinion of an independent expert that was not part of the string

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similarity review panel (Request, pages 10-11), references the intended uses of the .hotels and .hoteis strings (Request, page 11) and the difference in language populations that is expected to be using .hotels and .hoteis (Request, page 11), references ccTLDs that coexist with interchangeable "i"s and "l"s (Request, page 11), notes the keyboard location of "i"s and "l"s (Request, page 12), and contends that potential users who get to the wrong page would understand the error they made to get there (Request, page 12).

Booking.com does not suggest that the process for String Similarity Review set out in the Applicant Guidebook was not followed, or that ICANN staff violated any established ICANN policy in accepting the String Similarity Review Panel ("Panel") decision on placing .hotels and .hoteis in contention sets. Instead, Booking.com is supplanting what it believes the review methodology for assessing visual similarity should have been, as opposed to the methodology set out at Section 2.2.1.1.2 of the Applicant Guidebook. In asserting a new review methodology, Booking.com is asking the BGC (and the Board through the New gTLD Program Committee (NGPC)) to make a substantive evaluation of the confusability of the strings and to reverse the decision. In the context of the New gTLD Program, the Reconsideration process is not however intended for the Board to perform a substantive review of Panel decisions.. While Booking.com may have multiple reasons as to why it believes that its application for .hotels should not be in contention set with .hoteis, Reconsideration is not available as a mechanism to re-try the decisions of the evaluation panels.[3]

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[3] Notably, Booking.com fails to reference one of the key components of the documented String Similarity Review, the use of the SWORD Algorithm, which is part of what informs the Panel in assessing the visual similarity of strings. .hotels and .hoteis score a 99% on the publicly available SWORD algorithm for visual similarity. See https://icann.sword-group.com/algorithm/.

Booking.com also claims that its assertions regarding the non-confusability of the .hotels and .hoteis strings demonstrate that "it is contrary to ICANN policy[4] to put them in a contention set." (Request, pages 6-7.) This is just a differently worded attempt to reverse the decision of the Panel. No actual policy or process is cited by Booking.com, only the suggestion that – according to Booking.com – the standards within the Applicant Guidebook on visual similarity should have resulted in a different outcome for the .hotels string. This is not enough for Reconsideration.

Booking.com argues that the contention set decision was taken without material information, including Booking.com's linguistic expert's opinion, or other "information that would refute the mistaken contention that there is likely to be consumer confusion between '.hotels' and '.hoteis.'" (Request, page 7.) However, there is *no* process point in the String Similarity Review for applicants to submit additional information. This is in stark contrast to the reviews set out in Section 2.2.2 of the Applicant Guidebook, including the Technical/Operational review and the Financial Review, which allow for the evaluators to seek clarification or additional information through the issuance of clarifying questions. (AGB, Section 2.2.2.3 (Evaluation Methodology).) As ICANN has explained to Booking.com in response to its DIDP requests for documentation regarding the String Similarity Review, the Review was based upon the methodology in the Applicant Guidebook, supplemented by the Panel's process documentation; the process does not allow for additional inputs.

Just as the process does not call for additional applicant inputs into the visual similarity review, Booking.com's call for further information on the decision to place .hotels and .hoteis in

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[4] It is clear that when referring to "policy", Booking.com is referring to the process followed by the String Similarity Review.

a contention set "to give the Requester the opportunity to respond to this, before taking a final decision" is similarly not rooted in any established ICANN process at issue. (Request, page 9.) First, upon notification to the applicants and the posting of the String Similarity Review Panel report of contention sets, the decision was already final. While applicants may avail themselves of accountability mechanism to challenge decisions, the use of an accountability mechanism when there is no proper ground to bring a request for review under the selected mechanism does not then provide opportunity for additional substantive review of decisions already taken.

Second, while we understand the impact that Booking.com faces by being put in a contention set, and that it wishes for more narrative information regarding the Panel's decision, no such narrative is called for in the process. The Applicant Guidebook sets out the methodology used when evaluating visual similarity of strings. The process documentation provided by the String Similarity Review Panel describes the steps followed by the Panel in applying the methodology set out in the Applicant Guidebook. ICANN then coordinates a quality assurance review over a random selection of Panel's reviews to gain confidence that the methodology and process were followed. That is the process used for a making and assessing a determination of visual similarity. Booking.com's disagreement as to whether the methodology should have resulted in a finding of visual similarity does not mean that ICANN (including the third party vendors performing String Similarity Review) violated any policy in reaching the decision (nor does it support a conclusion that the decision was actually wrong).[5]

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[5] In trying to bring forward this Request, Booking.com submitted requests to ICANN under the Documentary Information Disclosure Policy (DIDP). As of 25 July 2013, all requests had been responded to, including the release of the Panel process documentation as requested. See Request 20130238-1 at http://www.icann.org/en/about/transparency. Booking.com describes the information it sought through the DIDP at Pages 8 – 9 of its Request. The discussion of those requests, however, has no bearing on the outcome of this Reconsideration.

B. **Booking.com's Suggestion of the "Advisory Status" of the String Similarity Panel Decision Does Not Support Reconsideration**

In its Request, Booking.com suggests that the Board has the ability to overturn the Panel's decision on .hotels/.hoteis because the Panel merely provided "advice to ICANN" and ICANN made the ultimate decision to accept that advice. Booking.com then suggests that the NGPC's acceptance of GAC advice relating to consideration of allowing singular and plural versions of strings in the New gTLD Program, as well as the NGPC's later determination that no changes were needed to the Applicant Guidebook regarding the singular/plural issue, shows the ability of the NGPC to override the Panel determinations. (Request, pages 5-6.) Booking.com's conclusions in these respects are not accurate and do not support Reconsideration.

The Panel reviewed all applied for strings according to the standards and methodology of the visual string similarity review set out in the Applicant Guidebook. The Guidebook clarifies that once contention sets are formed by the Panel, ICANN will notify the applicants and will publish results on its website. (AGB, Section 2.2.1.1.1.) That the Panel considered its output as "advice" to ICANN (as stated in its process documentation) is not the end of the story. Whether the results are transmitted as "advice" or "outcomes" or "reports", the important query is what ICANN was expected to do with that advice once it was received. ICANN had always made clear that it would rely on the advice of its evaluators in the initial evaluation stage of the New gTLD Program, subject to quality assurance measures. Therefore, Booking.com is actually proposing a new and *different* process when it suggests that ICANN should perform substantive review (instead of process testing) over the results of the String Similarity Review Panel's outcomes prior to the finalization of contention sets.

The subsequent receipt and consideration of GAC advice on singular and plural strings does not change the established process for the development of contention sets based on visual

similarity. The ICANN Bylaws require the ICANN Board to consider GAC advice on issues of public policy (ICANN Bylaws, Art. XI, Sec. 2.1.j); therefore the Board, through the NGPC, was obligated to respond to the GAC advice on singular and plural strings. Ultimately, the NGPC determined that no changes were needed to the Guidebook on this issue. (Resolution 2013.06.25.NG07, at http://www.icann.org/en/groups/board/documents/resolutions-new-gtld-25jun13-en.htm#2.d.) Notably, neither the GAC advice nor the NGPC resolution focused on the issue of visual similarity (which the String Similarity Review Panel was evaluating), but instead the issue was potential consumer confusion from having singular and plural versions of the same word in the root zone. It is unclear how the NGPC's decision on a separate topic – and a decision that did not in any way alter or amend the work of an evaluation panel – supports reconsideration of the development of the .hotels/.hoteis contention set.

VIII. Recommendation And Conclusion

Based on the foregoing, the BGC concludes that Booking.com has not stated proper grounds for reconsideration and we therefore recommend that Booking.com's request be denied without further consideration. This Request challenges a substantive decision taken by a panel in the New gTLD Program and not the process by which that decision was taken. As stated in our Recommendation on Request 13-2, Reconsideration is not a mechanism for direct, de novo appeal of staff or panel decisions with which the requester disagrees, and seeking such relief is, in fact, in contravention of the established processes within ICANN. See http://www.icann.org/en/groups/board/governance/reconsideration/recommendation-nameshop-01may13-en.pdf.

The BGC appreciates the impact to an applicant when placed in a contention set and does not take this recommendation lightly. It is important to recall that the applicant still has the

opportunity to proceed through the New gTLD Program subject to the processes set out in the Applicant Guidebook on contention. We further appreciate that applicants, with so much invested and so much at stake within the evaluation process, are interested in seeking any avenue that will allow their applications to proceed easily through evaluation. However, particularly on an issue such as visual similarity, which is related to the security and stability of the domain name system, there is not – nor is it desirable to have – a process for the BGC or the Board (through the NGPC) to supplant its own determination as to the visual similarity of strings over the guidance of an expert panel formed for that particular purpose. As there is no indication that either the Panel or ICANN staff violated any established ICANN policy in reaching or accepting the decision on the placement of .hotels and .hoteis in a non-exact contention set, this Request should not proceed.

If Booking.com thinks that it has been treated *unfairly* in the new gTLD evaluation process, and the NGPC adopts this Recommendation, Booking.com is free to ask the Ombudsman to review this matter. (*See* ICANN Bylaws the Ombudsman shall "have the right to have access to (but not to publish if otherwise confidential) all necessary information and records from ICANN staff and constituent bodies to enable an informed evaluation of the complaint and to assist in dispute resolution where feasible (subject only to such confidentiality obligations as are imposed by the complainant or any generally applicable confidentiality policies adopted by ICANN)".)

Annex 15.

Internet Corporation for Assigned Names and Numbers

Approved Resolutions | Meeting of the New gTLD Program Committee

Español (/es/groups/board/documents/resolutions-new-gtld-10sep13-es.htm)

Français (/fr/groups/board/documents/resolutions-new-gtld-10sep13-fr.htm)

Русский (/ru/groups/board/documents/resolutions-new-gtld-10sep13-ru.htm)

中文 (/zh/groups/board/documents/resolutions-new-gtld-10sep13-zh.htm)

العربية (/ar/groups/board/documents/resolutions-new-gtld-10sep13-ar.htm)

10 September 2013

1. **Consent Agenda**

   a. Approval of NGPC Meeting Minutes

2. **Main Agenda**

   a. Update on String Similarity

   b. BGC recommendation on Reconsideration Request 13-5

      Rationale for Resolution 2013.09.10.NG02

   c. GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Durban – Scorecard

      Rationale for Resolution 2013.09.10.NG03

   d. GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Beijing – Scorecard

   e. GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Beijing – Category 1

   f. ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement on the Preferential Treatment for Community Applications in String Contention

   g. ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement on Community Expertise in Community Priority Evaluation

   h. AOB

1.

   Consent Agenda:

   a.

      Approval of NGPC Meeting Minutes

      Resolved (2013.09.10.NG01), the Board approves the minutes of the 13 July 2013 and 17 July 2013 New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee Meetings.

2.

   Main Agenda:

   a.

Update on String Similarity

No resolution taken.

b.

==BGC recommendation on Reconsideration Request 13-5==

Whereas, Booking.com B.V.'s ("Booking.com") Reconsideration Request, Request 13-5, sought reconsideration of the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff action of 26 February 2013, when the results of the String Similarity Panel were posted for the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program, placing the applications for .hotels and .hoteis into a string similarity contention set.

Whereas, the BGC considered the issues raised in Reconsideration Request 13-5.

Whereas, the BGC recommended that Reconsideration Request 13-5 be denied because Booking.com has not stated proper grounds for reconsideration.

==Resolved (2013.09.10.NG02), the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee adopts the BGC Recommendation on Reconsideration Request 13-5, which can be found at http://www.icann.org/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf (/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf) [PDF, 117 KB].==

Rationale for Resolution 2013.09.10.NG02

ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Bylaws call for the Board Governance Committee to evaluate and make recommendations to the Board with respect to Reconsideration Requests. See Article IV, section 3 of the Bylaws. The New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee ("NGPC"), bestowed with the powers of the Board in this instance, has reviewed and thoroughly considered the BGC Recommendation on Reconsideration Request 13-5 and finds the analysis sound.

Having a reconsideration process whereby the BGC reviews and, if it chooses, makes a recommendation to the Board/NGPC for approval positively affects ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s transparency and accountability. It provides an avenue for the community to ensure that staff and the Board are acting in accordance with ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s policies, Bylaws, and Articles of Incorporation.

The Request seeks a reversal of the 26 February 2013 decision of the String Similarity Review Panel (the "Panel") to place Booking.com's application for .hotels in the same contention set as .hoteis. Specifically, Booking.com asserted that its applied for string of .hotels can co-exist in the root zone with the applied for string .hoteis without concern of confusability, and therefore, .hotels should not have been placed in the same contention set with .hoteis.

The Request calls into consideration: (1) whether the Panel violated any policy or process in conducting its visual similarity review of Booking.com's application; and (2) whether the NGPC has the ability to overturn the Panel's decision on .hotels/.hoteis on the basis that the decision was provided as an "advice to ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)" and that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) made the ultimate decision to accept that advice.

The BGC noted that a similar reconsideration request was previously submitted by Booking.com on 28 March 2013 and placed on hold pending the completion of a request pursuant to ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Documentary Information Disclosure Policy. Therefore, this Request relates back to the date of the original filing and should be evaluated under the Bylaws that were in effect from 20 December 2012 through 10 April 2013.

In consideration of the first issue, the BGC reviewed the grounds stated in the Request, including the attachments, and concluded that Booking.com failed to adequately state a Request for Reconsideration of Staff action because they failed to identify any policy or process that was violated by Staff. The BGC noted that Booking.com does not suggest that the process for String Similarity Review set out in the Applicant Guidebook was not

followed, or that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff violated any established ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) policy in accepting the Panel's decision to place .hotels and .hoteis in the same contention set. Rather, Booking.com seeks to supplant what it believes the review methodology for assessing visual similarity should have been as opposed to the methodology set out in Section 2.2.1.1.2 of the Applicant Guidebook and asks that the BGC (and the Board through the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee) retry the 26 February 2013 decision based upon its proposed methodology. The BGC concluded that this is not sufficient ground for Reconsideration because the Reconsideration process is not available as a mechanism to re-try the decisions of the evaluation panels.

With respect to Booking.com's contention that the 26 February 2013 decision was taken without material information, such as that of Booking.com's linguistic expert's opinion or other "information that would refute the mistaken contention that there is likely to be consumer confusion between '.hotels' and '.hoteis'", the BGC concluded that there is no process in the String Similarity Review for applicants to submit additional information. As ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) has explained to Booking.com in response to its DIDP requests for documentation regarding the String Similarity Review, the Review was based upon the methodology in the Applicant Guidebook, supplemented by the Panel's process documentation; the process does not allow for additional inputs. The BGC noted that Booking.com's disagreement as to whether the methodology should have resulted in a finding of visual similarity does not mean that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) (including the third party vendors performing String Similarity Review) violated any policy in reaching the decision (nor does it support a conclusion that the decision was actually wrong).

In consideration of the second issue, the BGC determined that Booking.com's suggestion that the Board (through the NGPC) has the ability to overturn the Panel's decision on .hotels/.hoteis because the Panel merely provided "advice to ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)" and that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) made the ultimate decision to accept that advice is based upon inaccurate conclusions of the String Similarity Review process. As such, the BGC concluded that Booking.com has not stated sufficient grounds for reconsideration. The BGC noted that all applied for strings are reviewed the Panel according to the standards and methodology of the visual string similarity review set out in the Applicant Guidebook. The Guidebook clarifies that once contention sets are formed by the Panel, ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) will notify the applicants and will publish results on its website. (AGB, Section 2.2.1.1.1.) Whether the results are transmitted as "advice" or "outcomes" or "reports", ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) had always made clear that it would rely on the advice of its evaluators in the initial evaluation stage of the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program, subject to quality assurance measures. The subsequent receipt and consideration of GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice on singular and plural strings does not change the established process for the development of contention sets based on visual similarity as the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board is required under the Bylaws to consider GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Advice on issues of public policy, such as singular and plural strings. The BGC concluded that Booking.com is actually proposing a new and different process when it suggests that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) should perform substantive review (instead of process testing) over the results of the String Similarity Review Panel's outcomes prior to the finalization of contention sets.

In addition to the above, the full BGC Recommendation that can be found at http://www.icann.org/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf (/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf) [PDF, 117 KB] and that is attached to the Reference Materials to the Board Submission supporting this resolution, shall also be deemed a part of this Rationale.

Adopting the BGC's recommendation has no financial impact on ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) and will not negatively impact the systemic security, stability and resiliency of the domain name system.

This decision is an Organizational Administrative Function that does not require public comment.

c.

GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Durban – Scorecard

Whereas, the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) met during the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) 47 meeting in Durban and issued a Communiqué on 18 July 2013 ("Durban Communiqué").

Whereas, on 1 August 2013, ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) posted the Durban Communiqué and officially notified applicants of the advice <http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en (http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en)>, triggering the 21-day applicant response period pursuant to the Applicant Guidebook Module 3.1.

Whereas, the NGPC met on 12 August 2013 to consider a plan for responding to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice on the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program, transmitted to the Board through its Durban Communiqué.

Whereas, the NGPC has considered the applicant responses submitted during the 21-day applicant response period, and the NGPC has identified items of advice in the attached scorecard where its position is consistent with the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Durban Communiqué.

Whereas, the NGPC developed a scorecard to respond to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Durban Communiqué similar to the one used to address the Beijing Advice as well as during the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) and the Board meetings in Brussels on 28 February and 1 March 2011, and has identified where the NGPC's position is consistent with GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice, noting those as "1A" items.

Whereas, the NGPC is undertaking this action pursuant to the authority granted to it by the Board on 10 April 2012, to exercise the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board's authority for any and all issues that may arise relating to the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program.

Resolved (2013.09.10.NG03), the NGPC adopts the "ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee Scorecard in response to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Durban Communiqué" (10 September 2013), attached as Annex 1 (/en/groups/board/documents/resolutions-new-gtld-annex-1-10sep13-en.pdf) [PDF, 119 KB] to this Resolution, in response to the items of GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice in the Durban Communiqué as presented in the scorecard.

Rationale for Resolution 2013.09.10.NG03

Why the NGPC is addressing the issue?

Article XI, Section 2.1 of the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Bylaws <http://www.icann.org/en/about/governance/bylaws#XI (/en/about/governance/bylaws#XI)> permit the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) to "put issues to the Board directly, either by way of comment or prior advice, or by way of specifically recommending action or new policy development or revision to existing policies." The GAC (Governmental Advisory Committee) (Governmental Advisory Committee) issued advice to the Board on the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program through its Durban Communiqué dated 18 July 2013. The ICANN (Internet Corporation

for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Bylaws require the Board to take into account the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice on public policy matters in the formulation and adoption of the polices. If the Board decides to take an action that is not consistent with the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice, it must inform the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) and state the reasons why it decided not to follow the advice. The Board and the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) will then try in good faith to find a mutually acceptable solution. If no solution can be found, the Board will state in its final decision why the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice was not followed.

What is the proposal being considered?

The NGPC is being asked to consider accepting the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s Durban advice as described in the attached ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee Scorecard in response to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Durban Communiqué" (10 September 2013). As noted in the scorecard, most items of advice are scored as "1A," which indicates that the NGPC's position is consistent with GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice as described in the scorecard.

Which stakeholders or others were consulted?

On 1 August 2013, ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) posted the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice and officially notified applicants of the advice <http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en (http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en)>, triggering the 21-day applicant response period pursuant to the Applicant Guidebook Module 3.1. The complete set of applicant responses are provided at: http://newgtlds.icann.org/en/applicants/gac-advice/durban47 (http://newgtlds.icann.org/en/applicants/gac-advice/durban47). The NGPC has considered the applicant responses in formulating its response to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice as applicable.

What concerns or issues were raised by the community?

As part of the 21-day applicant response period, several of the applicants indicated that they have entered into dialogue with the affected parties, and they anticipated reaching agreement on the areas of concern. Some of the applicants noted that they have proposed additional safeguards to address the concerns of the relevant governments are unsure as to whether a settlement can be reached. These applicants asked that the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board allow their applications to proceed even if an agreement among the relevant parties cannot be reached. Additionally, inquiries have been made as to whether applicants and the relevant governments will have the opportunity to comment on conversations among the GAC (Governmental Advisory Committee) (Governmental Advisory Committee), ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board, and ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff. There have been requests that that the GAC (Governmental Advisory Committee) (Governmental Advisory Committee), NGPC, and ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff consult with applicants before decisions regarding any additional safeguards are made.

Other applicants noted the important role of governments in the multi-stakeholder model, but advised the NGPC that it should not allow governments to exercise veto power over ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) policies adopted through the multi-stakeholder process.

What significant materials did the Board review?

As part of its deliberations, the NGPC reviewed the following materials and documents:

■

GAC (Governmental Advisory Committee) (Governmental Advisory Committee)
Durban Communiqué:
https://gacweb.icann.org/download/attachments/27132037/Final_GAC_Communique_Durban_20130717.
version=1&modificationDate=1374215119858&api=v2
(https://gacweb.icann.org/download/attachments/27132037/Final_GAC_Communique_Durban_20130717
version=1&modificationDate=1374215119858&api=v2) [PDF, 103 KB]

- Applicant responses to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice:
  http://newgtlds.icann.org/en/applicants/gac-advice/durban47
  (http://newgtlds.icann.org/en/applicants/gac-advice/durban47)

- Applicant Guidebook, Module 3:
  http://newgtlds.icann.org/en/applicants/agb/objection-procedures-04jun12-en.pdf
  (http://newgtlds.icann.org/en/applicants/agb/objection-procedures-04jun12-en.pdf)
  [PDF, 261 KB]

- Summary of Applicant Responses to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Advice in the Durban Communiqué (see reference materials).

What factors did the Board find to be significant?

In adopting its response to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Durban Communiqué, the NGPC considered the applicant comments submitted, the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice transmitted in the Durban Communiqué, and the procedures established in the AGB.

Are there positive or negative community impacts?

The adoption of the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice as provided in the attached scorecard will assist with resolving the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice in manner that permits the greatest number of new gTLD (generic Top Level Domain) (generic Top Level Domain) applications to continue to move forward as soon as possible.

Are there fiscal impacts or ramifications on ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) (strategic plan, operating plan, budget); the community; and/or the public?

There are no foreseen fiscal impacts associated with the adoption of this resolution.

Are there any security, stability or resiliency issues relating to the DNS (Domain Name System) (Domain Name System)?

Approval of the proposed resolution will not impact security, stability or resiliency issues relating to the DNS (Domain Name System) (Domain Name System).

Is this either a defined policy process within ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Supporting Organizations or ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Organizational Administrative Function decision requiring public comment or not requiring public comment?

ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) posted the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice and officially notified applicants of the advice on 1 August 2013. This triggered the 21-day applicant response period pursuant to the Applicant Guidebook Module 3.1.

d.

GAC (Governmental Advisory Committee) (Governmental Advisory Committee)
Communiqué Beijing – Scorecard

No resolution taken.

ICANN Network   Acronym Helper   Help

e.

GAC (Governmental Advisory Committee) (Governmental Advisory Committee)
Communiqué Beijing – Category 1

No resolution taken.

f.

ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement
on the Preferential Treatment for Community Applications in String Contention

No resolution taken.

g.

ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement
on Community Expertise in Community Priority Evaluation

No resolution taken.

h.

AOB

No resolution taken.

Published on 12 September 2013

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Annex 16.

Internet Corporation for Assigned Names and Numbers

Minutes | Meeting of the New gTLD Program Committee

Français (/fr/groups/board/documents/minutes-new-gtld-10sep13-fr.htm)

Español (/es/groups/board/documents/minutes-new-gtld-10sep13-es.htm)

Русский (/ru/groups/board/documents/minutes-new-gtld-10sep13-ru.htm)

中文 (/zh/groups/board/documents/minutes-new-gtld-10sep13-zh.htm)

العربية (/ar/groups/board/documents/minutes-new-gtld-10sep13-ar.htm)

10 September 2013

Note: On 10 April 2012, the Board established the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee, comprised of all voting members of the Board that are not conflicted with respect to the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program. The Committee was granted all of the powers of the Board (subject to the limitations set forth by law, the Articles of incorporation, Bylaws or ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Conflicts of Interest Policy) to exercise Board-level authority for any and all issues that may arise relating to the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program. The full scope of the Committee's authority is set forth in its charter at http://www.icann.org/en/groups/board/new-gTLD (/en/groups/board/new-gTLD).

A Special Meeting of the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee of the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board of Directors was held telephonically on 10 September 2013 at 13:00 UTC.

Committee Chairman Cherine Chalaby promptly called the meeting to order.

In addition to the Chair the following Directors participated in all or part of the meeting: Fadi Chehadé (President and CEO, ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)), Chris Disspain, Bill Graham, Olga Madruga-Forti, Erika Mann, Ray Plzak, George Sadowsky, Mike Silber, and Kuo-Wei Wu.

Gonzalo Navarro sent apologies.

Jonne Soininen (IETF (Internet Engineering Task Force) (Internet Engineering Task Force) Liaison) and Francisco da Silva (TLG Liaison) were in attendance as non-voting liaisons to the Committee. Heather Dryden was in attendance as an observer to the Committee. Bruce Tonkin was in attendance as an invited (non-voting) observer for Item 1 on the Main Agenda.

ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Staff in attendance for all or part of the meeting: Akram Atallah, President, Generic Domains Division; John Jeffrey, General Counsel and Secretary; Megan Bishop; Michelle Bright; Samantha Eisner; Allen Grogan; Dan Halloran; Jamie Hedlund; Elizabeth Le; Karen Lentz; Cyrus Namazi; Olof Nordling; David Olive; Karine Perset; Erika Randall; Amy Stathos; Christine Willett; and Mary Wong.

These are the Minutes of the Meeting of the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee, which took place on 10 September 2013.

1. **Consent Agenda**

   a. Approval of NGPC Meeting Minutes

2. **Main Agenda**

   a. Update on String Similarity

   b. BGC recommendation on Reconsideration Request 13-5

Rationale for Resolution 2013.09.10.NG02

c. GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Durban – Comprehensive Review of the Scorecard

Rationale for Resolution 2013.09.10.NG03

d. GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Beijing – Scorecard

e. GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Beijing – Category 1

f. ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement on the Preferential Treatment for Community Applications in String Contention

g. ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement on Community Expertise in Community Priority Evaluation

h. AOB

1.

Consent Agenda

a.

Approval of NGPC Meeting Minutes

The Chair introduced the item on the Consent Agenda. George Sadowsky moved and Chris Disspain seconded the resolution in the Consent Agenda and the Committee took the following action:

Resolved (2013.09.10.NG01), the NGPC approves the minutes of the 13 July 2013 and 17 July 2013 New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee Meetings.

All members of the Committee present voted in favor of Resolution 2013.09.10.NG01. Gonzalo Navarro was not available to vote on the Resolution. The Resolution carried.

2.

Main Agenda

a.

Update on String Similarity

The Chair provided an overview of the items on the main agenda to be considered by the Committee, and noted that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board Member Bruce Tonkin would participate in the discussion on the first agenda item to provide input on the string similarity review process.

Bruce Tonkin provided the Committee with an overview of how the string similarity standards were developed, explaining that string similarity is based on the GNSO (Generic Names Supporting Organization) (Generic Names Supporting Organization) Policy Recommendation Number 2, which states that strings must not be confusingly similar to an existing or applied-for top-level domain.

Bruce noted that when developing the string similarity standards, the GNSO (Generic Names Supporting Organization) (Generic Names Supporting Organization) considered the "confusingly similar" standard used in trademark law in various jurisdictions, and the Paris Convention for protection of intellectual property.

Bruce provided the Committee with a summary of the string similarity review process in initial evaluations, which focuses on visual similarity, and the string confusion objection process. Bruce noted that there was a key decision made early on in the iterations of the Applicant Guidebook that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers), in the initial evaluation stage, would only examine strings for visual confusion.

Bruce also explained the role of the string confusion objections in the process, and noted that the policy was to allow for a broader look at confusion – not just visual confusion. Bruce commented that that the string similarity objection is a dispute between two parties, and ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) is not involved.

Bruce commented that some applicants who have received unfavorable determinations from the string similarity review process or the string similarity objection process have proceeded to invoke the Reconsideration Request process provided for in the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Bylaws.

Mike Silber noted three key issues for the Committee to consider with regard to the string similarity decisions. Mike asked the Committee to consider what, if anything, should be done to address the perceived inconsistency between the findings of the various string confusion objection panels. Mike stated that the Committee also should consider the decisions of the string similarity review panel and whether there are changes needed in future rounds in light of the concerns raised in the current round. Mike noted that staff would prepare a briefing paper providing more details about these concerns for discussion at the Committee's next meeting.

The Chair inquired whether Mike was suggesting that any action would only impact future rounds. Erika Mann asked whether Mike recommended that the Committee should ask the experts to provide consistent opinions. Mike clarified that the Committee should first understand whether there is a genuine problem before it takes action. Additionally, Mike recommended that the Committee needs to better understand the consequences of taking action to impact the current round.

Akram Atallah recommended that the Committee keep separate the issues of the string similarity review, which looked only at visual similarity, from the string confusion objection. Akram indicated that staff would prepare a paper regarding these issues for future conversation.

After the conclusion of the discussion, Bruce excused himself from the remainder of the meeting.

b.

BGC recommendation on Reconsideration Request 13-5

The Chair introduced the item to the Committee and Amy Stathos presented an overview of Reconsideration Request 13-5, including the Board Governance Committee's (BGC) recommendation to the Committee. Amy noted that the requester argued that the decision of the string similarity review panel should be reversed so that "hotels" and "hoteis" are not in a contention set with each other. Amy also reminded the Committee of the basis in the Bylaws for Reconsideration Requests. The BGC determined that the requester had not stated proper grounds for reconsideration.

George Sadowsky stated that he understood that the BGC did the right thing, but thought the end result that was contrary to ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s and the user's best interests. George noted he intended to abstain from voting as a result.

Olga Madruga-Forti noted that she intended to abstain from the vote because there was not sufficient rationale provided for why the string similarity review panel made its determination.

The Chair noted the party submitting the Reconsideration Request essentially just disagrees with the decision. Because the process was followed, the Chair noted that the Committee should not accept the Reconsideration Request.

Ray Plzak agreed that the process was followed, but noted that the process needs to be reviewed to potentially add a mechanism that would allow persons who don't agree with the outcome to make an objection, other than using a Reconsideration Request. Ray recommended the Committee send a strong signal to the BGC, or adopt a resolution recommending that a the BGC consider development of a different mechanism to provide an avenue for the community to appeal the outcome of a decision based on the merits. Olga recommended that in the future, a remand or appeals mechanism may help alleviate the concerns noted.

Bill Graham agreed with Ray's suggestion, and noted that generally, there is a considerable level of discomfort and dissatisfaction with the process as expressed by Committee members. The Chair agreed with Bill's sentiment.

The General Counsel and Secretary noted that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) has tried to encourage more use of the ombudsman, or other accountability mechanisms for these types of concerns.

The President and CEO moved and Ray Plzak seconded the resolution.

The Committee then took the following action:

Whereas, Booking.com B.V.'s ("Booking.com") Reconsideration Request, Request 13-5, sought reconsideration of the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff action of 26 February 2013, when the results of the String Similarity Panel were posted for the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program, placing the applications for .hotels and .hoteis into a string similarity contention set.

Whereas, the BGC considered the issues raised in Reconsideration Request 13-5.

Whereas, the BGC recommended that Reconsideration Request 13-5 be denied because Booking.com has not stated proper grounds for reconsideration.

Resolved (2013.09.10.NG02), the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee adopts the BGC Recommendation on Reconsideration Request 13-5, which can be found at http://www.icann.org/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf (/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf) [PDF, 117 KB].

The Chair took a voice vote of Resolution 2013.09.10.NG02. Cherine Chalaby, Fadi Chehadé, Chris Disspain, Bill Graham, and Mike Silber voted in favor of Resolution 2013.09.10.NG02. Olga Madruga-Forti, Ray Plzak, George Sadowsky and Kuo-Wei Wu abstained from voting on Resolution 2013.09.10.NG02. Erika Mann and Gonzalo Navarro were not available to vote on Resolution 2013.09.10.NG02. The Resolution carried.

Rationale for Resolution 2013.09.10.NG02

ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Bylaws call for the Board Governance Committee to evaluate and make recommendations to the Board with respect to Reconsideration Requests. See Article IV, section 3 of the Bylaws. The New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee ("NGPC"), bestowed with the powers of the Board in this instance, has reviewed and thoroughly considered the BGC Recommendation on Reconsideration Request 13-5 and finds the analysis sound.

Having a reconsideration process whereby the BGC reviews and, if it chooses, makes a recommendation to the Board/NGPC for approval positively affects ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s transparency and accountability. It provides an avenue for the community to ensure that staff and the Board are acting in accordance with ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s policies, Bylaws, and Articles of Incorporation.

The Request seeks a reversal of the 26 February 2013 decision of the String Similarity Review Panel (the "Panel") to place Booking.com's application for .hotels in the same contention set as .hoteis. Specifically, Booking.com asserted that its applied for string of .hotels can co-exist in the root zone with the applied for string .hoteis without concern of confusability, and therefore, .hotels should not have been placed in the same contention set with .hoteis.

The Request calls into consideration: (1) whether the Panel violated any policy or process in conducting its visual similarity review of Booking.com's application; and (2) whether the NGPC has the ability to overturn the Panel's decision on .hotels/.hoteis on the basis that the decision was provided as an "advice to ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)" and that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) made the ultimate decision to accept that advice.

The BGC noted that a similar reconsideration request was previously submitted by Booking.com on 28 March 2013 and placed on hold pending the completion of a request pursuant to ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Documentary Information Disclosure

Policy. Therefore, this Request relates back to the date of the original filing and should be evaluated under the Bylaws that were in effect from 20 December 2012 through 10 April 2013.

In consideration of the first issue, the BGC reviewed the grounds stated in the Request, including the attachments, and concluded that Booking.com failed to adequately state a Request for Reconsideration of Staff action because they failed to identify any policy or process that was violated by Staff. The BGC noted that Booking.com does not suggest that the process for String Similarity Review set out in the Applicant Guidebook was not followed, or that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff violated any established ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) policy in accepting the Panel's decision to place .hotels and .hoteis in the same contention set. Rather, Booking.com seeks to supplant what it believes the review methodology for assessing visual similarity should have been as opposed to the methodology set out in Section 2.2.1.1.2 of the Applicant Guidebook and asks that the BGC (and the Board through the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee) retry the 26 February 2013 decision based upon its proposed methodology. The BGC concluded that this is not sufficient ground for Reconsideration because the Reconsideration process is not available as a mechanism to re-try the decisions of the evaluation panels.

With respect to Booking.com's contention that the 26 February 2013 decision was taken without material information, such as that of Booking.com's linguistic expert's opinion or other "information that would refute the mistaken contention that there is likely to be consumer confusion between '.hotels' and '.hoteis'", the BGC concluded that there is no process in the String Similarity Review for applicants to submit additional information. As ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) has explained to Booking.com in response to its DIDP requests for documentation regarding the String Similarity Review, the Review was based upon the methodology in the Applicant Guidebook, supplemented by the Panel's process documentation; the process does not allow for additional inputs. The BGC noted that Booking.com's disagreement as to whether the methodology should have resulted in a finding of visual similarity does not mean that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) (including the third party vendors performing String Similarity Review) violated any policy in reaching the decision (nor does it support a conclusion that the decision was actually wrong).

In consideration of the second issue, the BGC determined that Booking.com's suggestion that the Board (through the NGPC) has the ability to overturn the Panel's decision on .hotels/.hoteis because the Panel merely provided "advice to ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)" and that ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) made the ultimate decision to accept that advice is based upon inaccurate conclusions of the String Similarity Review process. As such, the BGC concluded that Booking.com has not stated sufficient grounds for reconsideration. The BGC noted that all applied for strings are reviewed the Panel according to the standards and methodology of the visual string similarity review set out in the Applicant Guidebook. The Guidebook clarifies that once contention sets are formed by the Panel, ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) will notify the applicants and will publish results on its website. (AGB, Section 2.2.1.1.1.) Whether the results are transmitted as "advice" or "outcomes" or "reports", ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) had always made clear that it would rely on the advice of its evaluators in the initial evaluation stage of the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program, subject to quality assurance measures. The subsequent receipt and consideration of GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice on singular and plural strings does not change the established process for the development of contention sets based on visual similarity as the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board is required under the Bylaws to consider GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Advice on issues of public policy, such as singular and plural strings. The BGC concluded that Booking.com is actually proposing a new and different process when it suggests that ICANN (Internet Corporation for Assigned Names and Numbers)

(Internet Corporation for Assigned Names and Numbers) should perform substantive review (instead of process testing) over the results of the String Similarity Review Panel's outcomes prior to the finalization of contention sets.

In addition to the above, the full BGC Recommendation that can be found at http://www.icann.org/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf (/en/groups/board/governance/reconsideration/recommendation-booking-01aug13-en.pdf) [PDF, 117 KB] and that is attached to the Reference Materials to the Board Submission supporting this resolution, shall also be deemed a part of this Rationale.

Adopting the BGC's recommendation has no financial impact on ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) and will not negatively impact the systemic security, stability and resiliency of the domain name system.

This decision is an Organizational Administrative Function that does not require public comment.

Members of the Committee who abstained from voting offered voting statements. Ray Plzak noted that he abstained from voting because he is disappointed in what is being done to remedy the situation. Ray would like to see more resolve to fix the process.

Olga Madruga-Forti stated that the BGC has done an appropriate job of applying a limited review standard to the application for reconsideration, but unfortunately, in this circumstance, to apply that limited review accompanied by a lack of information regarding the rationale of the string similarity review panel is not possible in a logical and fair manner. The public interest would not be served by applying the limited review standard without proper information on the basis and reasoning for the decision of the panel. In my opinion, the public interest would be better served by abstaining and continuing to explore ways to establish a better record of the rationale of the string similarity review panel in circumstances such as this.

Kuo-Wei Wu agreed with the voting statements of Ray and Olga.

George Sadowsky provided the following voting statement: I have a strong concern regarding the ratification of the BGC recommendation to deny the reconsideration request regarding string contention between .hoteis and .hotels, and I therefore have therefore abstained when the vote on this issue was taken.

The reconsideration process is a very narrowly focused instrument, relying solely upon investigating deviations from established and agreed upon process. As such, it can be useful, but it is limited in scope. In particular, it does not address situations where process has in fact been followed, but the results of such process have been regarded, sometimes quite widely, as being contrary to what might be best for significant or all segments of the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) community and/or Internet users in general.

The rationale underlying the rejection of the reconsideration claim is essentially that the string similarity process found that there was likely to be substantial confusion between the two, and that therefore they belonged in a contention set. Furthermore, no process has been identified as having been violated and therefore there is nothing to reconsider.

As a Board member who is aware of ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Bylaws, I cannot vote against the motion to deny reconsideration. The motion appears to be correct based upon the criteria in the Bylaws that define the reconsideration process and the facts in this particular case.

However, I am increasingly disturbed by the growing sequence of decisions that are based upon a criterion for user confusion that, in my opinion, is not only both incomplete and flawed, but appears to work directly against the concept that users should not be confused. I am persuaded by the argument made by the proponents of reconsideration in this case that users will in fact not be confused by .hoteis and .hotels, since if they enter the wrong name, they are very likely to be immediately confronted by information in a language that they did not anticipate.

Confusion is a perceptual issue. String similarity is only one consideration in thinking about perceptual confusion and in fact it is not always an issue. In my opinion, much more perceptual confusion will arise between .hotel and .hotels than between .hotels and .hoteis. Yet if we adhere strictly to the Guidebook and whatever instructions have or have not been given to string similarity experts, it is my position that we work against implementing decisions that assist in avoiding user confusion, and we work in favor of decisions that are based upon an incorrect, incomplete and flawed *ex ante* analysis of the real issues with respect to user confusion.

The goal of the string similarity process is the minimization of user confusion and ensuring user trust in using the DNS (Domain Name System) (Domain Name System). The string similarity exercise is one of the means in the new gTLD (generic Top Level Domain) (generic Top Level Domain) process to minimize such confusion and to strengthen user trust. In placing our emphasis, and in fact our decisions, on string similarity only, we are unwittingly substituting the means for the goal, and making decisions regarding the goal on the basis of a means test. This is a disservice to the Internet user community.

I cannot and will not vote in favor of a motion that reflects, directly or indirectly, an unwillingness to depart from what I see as such a flawed position and which does not reflect In my opinion an understanding of the current reality of the situation.

The Committee agreed to discuss the process further at its meeting in Los Angeles.

c.

GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Durban – Comprehensive Review of the Scorecard

Chris Disspain led the Committee through a discussion of each of the items on the proposed scorecard to address the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Durban Communiqué. Chris noted that the window for applicants to respond to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice had closed and the comments were available for consideration by the Committee.

The Committee discussed that additional time was needed to consider its position on the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) consensus objection advice concerning .AMAZON given the information presented in the applicant's response.

Chris noted that recently, a series of communications concerning the .THAI application were provided to the Committee, which assert that the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice was not valid. Chris clarified that GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s position in respect to its consensus advice on the application for .THAI is supported by the government of Thailand.

Chris discussed the proposed position in the scorecard for .SPA, .YUN, .GUANGZHOU, and .SHENZHEN. Kuo-Wei Wu asked whether the proposed response in the scorecard applied to all strings with geographic indicators. Chris clarified that the scorecard only considers the strings for which the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) issued advice.

The Committee also discussed the new correspondence from the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) regarding .WINE and .VIN. Heather Dryden acknowledged the complexity of the issue, and noted that even though the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) did not arrive at consensus agreement, there is benefit in increasing the Committee's understanding about the reasons for the differing views that exist among the members in the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) on the applications for .VIN and .WINE. The Committee decided to consider the advice at its next meeting in Los Angeles.

The Committee considered the remaining items in the scorecard.

Chris Disspain moved and George Sadowsky seconded the resolution.

The Committee then took the following action:

Whereas, the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) met during the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) 47 meeting in Durban and issued a Communiqué on 18 July 2013 ("Durban Communiqué").

Whereas, on 1 August 2013, ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) posted the Durban Communiqué and officially notified applicants of the advice <http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en (http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en)>, triggering the 21-day applicant response period pursuant to the Applicant Guidebook Module 3.1.

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Whereas, the NGPC met on 12 August 2013 to consider a plan for responding to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice on the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program, transmitted to the Board through its Durban Communiqué.

Whereas, the NGPC has considered the applicant responses submitted during the 21-day applicant response period, and the NGPC has identified items of advice in the attached scorecard where its position is consistent with the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Durban Communiqué.

Whereas, the NGPC developed a scorecard to respond to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Durban Communiqué similar to the one used to address the Beijing Advice as well as during the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) and the Board meetings in Brussels on 28 February and 1 March 2011, and has identified where the NGPC's position is consistent with GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice, noting those as "1A" items.

Whereas, the NGPC is undertaking this action pursuant to the authority granted to it by the Board on 10 April 2012, to exercise the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board's authority for any and all issues that may arise relating to the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program.

Resolved (2013.09.10.NG03), the NGPC adopts the "ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee Scorecard in response to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Durban Communiqué" (10 September 2013), attached as Annex 1 (/en/groups/board/documents/resolutions-new-gtld-annex-1-10sep13-en.pdf) [PDF, 119 KB] to this Resolution, in response to the items of GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice in the Durban Communiqué as presented in the scorecard.

All members of the Committee present voted in favor of Resolution 2013.09.10.NG03. Erika Mann and Gonzalo Navarro were not available to vote on Resolution 2013.09.10.NG03. The Resolution carried.

Rationale for Resolution 2013.09.10.NG03

Why the NGPC is addressing the issue?

Article XI, Section 2.1 of the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Bylaws <http://www.icann.org/en/about/governance/bylaws – XI (/en/about/governance/bylaws#XI)> permit the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) to "put issues to the Board directly, either by way of comment or prior advice, or by way of specifically recommending action or new policy development or revision to existing policies." The GAC (Governmental Advisory Committee) (Governmental Advisory Committee) issued advice to the Board on the New gTLD (generic Top Level Domain) (generic Top Level Domain) Program through its Durban Communiqué dated 18 July 2013. The ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Bylaws require the Board to take into account the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice on public policy matters in the formulation and adoption of the polices. If the Board decides to take an action that is not consistent with the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice, it must inform the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) and state the reasons why it decided not to follow the advice. The Board and the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) will then try in good faith to find a mutually acceptable solution. If no solution can be found, the Board will state in its final decision why the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice was not followed.

What is the proposal being considered?

The NGPC is being asked to consider accepting the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s Durban advice as described in the attached ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board New gTLD (generic Top Level Domain) (generic Top Level Domain) Program Committee Scorecard in response to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Durban

Communiqué" (10 September 2013). As noted in the scorecard, most items of advice are scored as "1A," which indicates that the NGPC's position is consistent with GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice as described in the scorecard.

Which stakeholders or others were consulted?

On 1 August 2013, ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) posted the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice and officially notified applicants of the advice <http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en (http://newgtlds.icann.org/en/announcements-and-media/announcement-01aug13-en)>, triggering the 21-day applicant response period pursuant to the Applicant Guidebook Module 3.1. The complete set of applicant responses are provided at: http://newgtlds.icann.org/en/applicants/gac-advice/durban47 (http://newgtlds.icann.org/en/applicants/gac-advice/durban47). The NGPC has considered the applicant responses in formulating its response to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice as applicable.

What concerns or issues were raised by the community?

As part of the 21-day applicant response period, several of the applicants indicated that they have entered into dialogue with the affected parties, and they anticipated reaching agreement on the areas of concern. Some of the applicants noted that they have proposed additional safeguards to address the concerns of the relevant governments are unsure as to whether a settlement can be reached. These applicants asked that the ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board allow their applications to proceed even if an agreement among the relevant parties cannot be reached. Additionally, inquiries have been made as to whether applicants and the relevant governments will have the opportunity to comment on conversations among the GAC (Governmental Advisory Committee) (Governmental Advisory Committee), ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) Board, and ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff. There have been requests that that the GAC (Governmental Advisory Committee) (Governmental Advisory Committee), NGPC, and ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) staff consult with applicants before decisions regarding any additional safeguards are made.

Other applicants noted the important role of governments in the multi-stakeholder model, but advised the NGPC that it should not allow governments to exercise veto power over ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) policies adopted through the multi-stakeholder process.

What significant materials did the Board review?

As part of its deliberations, the NGPC reviewed the following materials and documents:

- GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Durban Communiqué: https://gacweb.icann.org/download/attachments/27132037/Final_GAC_Communique_Durban_20130717. version=1&modificationDate=1374215119858&api=v2 (https://gacweb.icann.org/download/attachments/27132037/Final_GAC_Communique_Durban_20130717 version=1&modificationDate=1374215119858&api=v2) [PDF, 103 KB]

- Applicant responses to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice: http://newgtlds.icann.org/en/applicants/gac-advice/durban47 (http://newgtlds.icann.org/en/applicants/gac-advice/durban47)

- Applicant Guidebook, Module 3: http://newgtlds.icann.org/en/applicants/agb/objection-procedures-04jun12-en.pdf (http://newgtlds.icann.org/en/applicants/agb/objection-procedures-04jun12-en.pdf) [PDF, 261 KB]

- Summary of Applicant Responses to GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Advice in the Durban Communiqué (see reference materials).

What factors did the Board find to be significant?

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In adopting its response to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Durban Communiqué, the NGPC considered the applicant comments submitted, the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice transmitted in the Durban Communiqué, and the procedures established in the AGB.

Are there positive or negative community impacts?

The adoption of the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice as provided in the attached scorecard will assist with resolving the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice in manner that permits the greatest number of new gTLD (generic Top Level Domain) (generic Top Level Domain) applications to continue to move forward as soon as possible.

Are there fiscal impacts or ramifications on ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) (strategic plan, operating plan, budget); the community; and/or the public?

There are no foreseen fiscal impacts associated with the adoption of this resolution.

Are there any security, stability or resiliency issues relating to the DNS (Domain Name System) (Domain Name System)?

Approval of the proposed resolution will not impact security, stability or resiliency issues relating to the DNS (Domain Name System) (Domain Name System).

Is this either a defined policy process within ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Supporting Organizations or ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers)'s Organizational Administrative Function decision requiring public comment or not requiring public comment?

ICANN (Internet Corporation for Assigned Names and Numbers) (Internet Corporation for Assigned Names and Numbers) posted the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice and officially notified applicants of the advice on 1 August 2013. This triggered the 21-day applicant response period pursuant to the Applicant Guidebook Module 3.1.

d.

GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Beijing – Scorecard

The Committee engaged in a discussion on the open items of GAC (Governmental Advisory Committee) (Governmental Advisory Committee) advice in the Beijing Communiqué, including the Category 1 and Category 2 safeguard advice, and the protections for IGOs.

Chris Disspain provided the Committee with an update on the current proposal to address protections for IGOs, which would leverage the functionality of the current Trademark Clearinghouse claims function and the rapid take-down process of the URS. Chris noted that there might be a session among the NGPC and IGOs at the end of September to discuss a proposed approach to providing the protections.

With respect to the Category 2 safeguard advice, Christine Willet provided the Committee with an update of responses received from the applicants of strings identified in the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice regarding exclusive access for a generic string. Akram Atallah noted that the applicant responses received to date indicate that only a handful of the applicants intended to provide exclusive registry access.

The Committee agreed to discuss the path forward for the Category 2 safeguard advice at its next meeting.

e.

GAC (Governmental Advisory Committee) (Governmental Advisory Committee) Communiqué Beijing – Category 1

Chris Disspain provided the Committee an update on the proposed approach to respond to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee)'s advice in the Beijing Communiqué regarding the Category 1 safeguards, and the Committee engaged in a discussion regarding a path forward. The discussion included

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consideration of how the safeguards could be implemented as contractual provisions, and distinguishing the list of Category 1 strings between those strings associated regulated industries, and all other listed strings.

Chris recommended a strategy for continued progress on the Category 1 safeguard advice, which included preparing a paper describing the proposed framework to address the advice, and socializing the paper among a small number of GAC (Governmental Advisory Committee) (Governmental Advisory Committee) members before it is communicated to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee).

Jonne Soininen recommended that GAC (Governmental Advisory Committee) (Governmental Advisory Committee) members from non-English speaking nations be included in the discussions. Olga Madruga-Forti concurred with the recommendation.

Heather Dryden commented that the full GAC (Governmental Advisory Committee) (Governmental Advisory Committee) membership should be able to participate in the process, as appropriate, before the Committee finalizes the proposal.

Jonne inquired whether there are national variations that could cause concern from the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) about what is considered regulated industry and what is not. Olga noted the importance of beginning to consider the consequences if there is non-compliance with a contractual obligation related to the Category 1 safeguards.

The Committee acknowledged the difficulty in scheduling an intersessional meeting with the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) on this matter given the timing of the Buenos Aires meeting, and discussed how to move forward in advance of the Buenos Aires meeting.

f.

ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement on the Preferential Treatment for Community Applications in String Contention

George Sadowsky provided the Committee with an overview of the concern expressed by the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) in its Statement on the Preferential Treatment for Community Applications in String Contention, noting that ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) requested the Committee to provide preferential treatment to applications that meet the characteristics of community applications even if not submitted as a community application.

George indicated that he had discussions with the drafter of the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement to better understand the concerns underlying the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee)'s letter.

The Committee discussed the concerns with implementing the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee)'s recommendation. Chris Disspain highlighted the need to be consistent with the position the Committee communicated to the GAC (Governmental Advisory Committee) (Governmental Advisory Committee) on this issue.

George noted that it may be difficult to accept the recommendation in the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement, and Ray Plzak agreed.

George agreed to work with staff to prepare a response to the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee), and noted that the response should include consideration of the additional questions sent by the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) after it submitted the statement at hand.

g.

ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement on Community Expertise in Community Priority Evaluation

George Sadowsky presented the concerns expressed in the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) Statement on Community Expertise in Community Priority Evaluation, noting that the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) questions the ability of the chosen community priority evaluator to evaluate with respect to a mind-set that is more community-focused as opposed to business-focused.

The Committee considered whether it would be appropriate to accept the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee)'s advice for ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) to supply evaluators from the community to the panel, and George recommended against adopting this approach. Ray Plzak agreed, and commented that the Committee should not set a precedent in terms of inviting other people into assist with the work of panels, outside of the established process the exists to form the panels.

George proposed that the Committee direct staff to alert the panel of the concerns expressed in the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) statement. George also outlined a proposed response to the ALAC (At-Large Advisory Committee) (At-Large Advisory Committee) and agreed to work with staff on a formal response.

George commented that upon completion of the community priority evaluation process, it may be beneficial to do an informal audit to look for any egregious violations of understanding about the community priority evaluation.

h.

AOB

The Committee did not discuss any other business, and the Chair called then called the meeting to a close.

Published on 30 September 2013

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Annex 17.

crowell moring

Flip Petillion
Advocaat
Contact Information Redacted

Our ref :   fpe/mne/107646.0000003
Your ref :

25 September 2013

To the attention of:

Mr. Steve Crocker
Chair, ICANN Board;

Mr. Cherine Chalaby
Chair, New gTLD Program Committee; and

Mr. Fadi Chehade,
President and CEO, ICANN

12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536
USA

By regular mail, fax +1 310 823 8649 and by e-mail: independentreview@icann.org

Re: Cooperative engagement process

Dear Sirs,

I write you on behalf of Booking.com B.V., a Dutch company having its company seat at Herengracht 597, Amsterdam, - 1017 CE, NL (hereinafter, "Booking.com"). Reference is made to New gTLD Program Committee's resolution on Reconsideration Request 13-5, passed on 10 September 2013 and posted on 12 September 2013, known as Resolution 2013.09.10.NG02 and affecting Booking.com.

Booking.com is of the opinion that Resolution 2013.09.10.NG02 violates various provisions of ICANN's Bylaws and Articles of Incorporation. In particular, Booking.com considers that ICANN's adoption of Resolution 2013.09.10.NG02 is in violation of Articles I, II(3), III and IV of the ICANN Bylaws as well as Article 4 of ICANN's Articles of Incorporation. In addition, Booking.com considers that ICANN has acted in violation of Articles 3, 5, 7 and 9 of ICANN's Affirmation of Commitment in adopting Resolution 2013.09.10.NG02.

In view of the above, Booking.com has given me the instruction to file a request for independent review on their behalf. Booking.com remains however committed to cooperate with ICANN in good faith in finding a solution. Therefore, Booking.com elects to proceed with the cooperative engagement process, in which I will act as Booking.com's single point of

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contact for the resolution of the issue.

The present letter serves as written notice to ICANN invoking the cooperative engagement process. ICANN is requested to confirm the suspension of the deadline for Booking.com to file a request for Independent Review for the duration of the cooperative engagement process, meaning that Booking.com shall have 17 days to file a request for Independent Review, following notice by ICANN that the cooperative engagement process has ended.

I will send my complete personal contact details to you in a separate email, under the condition that you keep this information confidential.

Yours sincerely,

Flip Petillion
Crowell & Moring LLP
Contact Information Redacted

Annex 18.

APPLICATION DETAILS

View Application Update History (/application-result/applicationstatus/applicationdetails:viewapplicationchangehistory/640?t:ac=640)

Application ID: 1-1577-85976

String: PARTS (download public portion of application (/application-result/applicationstatus/applicationdetails:downloadapplication/640?t:ac=640))

Applicant: Sea Goodbye, LLC

Prioritization Number: 1714

Address: Contact Information Redacted

Web Site:

Primary Contact: Daniel Schindler

                Contact Information Redacted

Phone Number:

Email: Contact Information Redacted

Attachments (5):

Caution: these files were prepared and submitted by a party other than ICANN, and ICANN is not responsible for the content. The files could contain scripts or embedded links that might execute or open automatically. You should make sure your operating system and applications (including antivirus definitions if applicable) are fully updated. Proceed at your own risk.

- 24 (A24.1 Attachment A.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/33313?t:ac=640)
- 26 (A26.1 Attachment A.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/33329?t:ac=640)
- 27 (A27.1 Registration Lifecycle Illustrations.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/33338?t:ac=640)
- 29 (A29.1 Attachment A.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/33344?t:ac=640)
- 30a (A30a.1 Attachment A.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/33352?t:ac=640)

Public Interest Commitments (PICs): 1-1577-85976_Donuts PIC STD Final.pdf (/application-result/applicationstatus/applicationdetails:downloadpicposting/640?t:ac=640)

Application Status: Delegated

Evaluation Result: Pass IE (IE Report (http://newgtlds.icann.org/en/program-status/application-results/ie-1-1577-85976-en.pdf))

Registry Agreement: http://www.icann.org/en/about/agreements/registries/PARTS (http://www.icann.org/en/about/agreements/registries/PARTS)

Annex 19.

APPLICATION DETAILS

View Application Update History (/application-result/applicationstatus/applicationdetails:viewapplicationchangehistory/1450?t:ac=1450)

Application ID: 1-1087-47153

String: PARIS (download public portion of application (/application-result/applicationstatus/applicationdetails:downloadapplication/1450?t:ac=1450))

Applicant: City of Paris

Prioritization Number: 200

Address: Contact Information Redacted

Web Site: http://www.paris.fr/

Primary Contact: Fabien BETREMIEUX

Phone Number: Contact Information Redacted

Email: Contact Information Redacted

Attachments (13):

Caution: these files were prepared and submitted by a party other than ICANN, and ICANN is not responsible for the content. The files could contain scripts or embedded links that might execute or open automatically. You should make sure your operating system and applications (including antivirus definitions if applicable) are fully updated. Proceed at your own risk.

- 20f (Q20-Endorsment-0-VilledeParis.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/109646?t:ac=1450)
- 20f (Q20-Endorsment-1-MAE.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/86840?t:ac=1450)
- 23 (Q23_1_authorisation_code_workflow.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75072?t:ac=1450)
- 24 (Q24_3_srs_architecture_diagram.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75074?t:ac=1450)
- 25 (Q25_2.1_epp_xsd_main_schema.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75077?t:ac=1450)
- 25 (Q25_2.3.2_SRS_autorisation_code.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75080?t:ac=1450)
- 25 (Q25_2.3.2_epp_create_command_example.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/84757?t:ac=1450)
- 25 (Q25_4.1_epp_xsd_dnssec_extension_schema.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75081?t:ac=1450)
- 25 (Q25_4.3_epp_xsd_sunrise_extension_schema.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75082?t:ac=1450)
- 26 (Q26_3_rdds_architecture_diagram.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75084?t:ac=1450)
- 27 (Q27_3_global_lifecycle.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75089?t:ac=1450)

- 27 (Q27_5_transfer_lifecycle.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75090?t:ac=1450)
- 27 (Q27_6_grace_period_renew_autorenew.pdf) (/application-result/applicationstatus/applicationdetails:downloadattachment/75091?t:ac=1450)

Application Status: In PDT

Evaluation Result: Pass IE (IE Report (http://newgtlds.icann.org/en/program-status/application-results/ie-1-1087-47153-en.pdf))

Registry Agreement: http://www.icann.org/en/about/agreements/registries/PARIS (http://www.icann.org/en/about/agreements/registries/PARIS)

Annex 20.

Flip Petillion
Partner
Crowell & Moring, LLP
Contact Information Redacted

By mail land email: Contact Information Redacted

10 March 2014

Dear Sir,

I refer to your request to (1) review and comment on ICANN's process regarding strings that may be confusingly similar to a degree that it prevents them from being delegated; and (2) review ICANN's decision to put .hotels and .hoteis in a contention set in light of:

- ICANN's framework for assessing string similarity;
- the String Similarity Panel's decision that .hotels and .hoteis were confusingly similar; and
- the other gTLD applications and the existing DNS.

String comparison is a subject that I regularly examine on a professional basis. As explained below, I have complemented, as a linguist, my analysis and conclusions with a psycholinguistic analysis, provided by Dr. Emmanuel Keuleers.

In Attachments 1 and 2, I have added detailed information on our respective professional backgrounds and qualifications.

Below, I will describe:

1. the context of your request;
2. the multi-disciplinary methodology I have adopted;
3. our linguistic and psycholinguistic findings ; and
4. my conclusions.

Executive summary

ICANN's methodology for assessing string similarity does not permit any valid conclusions on string similarity. Various aspects of the methodology demonstrate that *construct validity, i.e.,* the need for a methodology to measure what it actually claims to measure, has been largely overlooked. There is no reference to any attempt to link the methodology to empirical evidence obtained by *experimental testing of string confusion in human readers*. Moreover, given that the ICANN approach is based on human and algorithmic assessment of string similarity, it is surprising that the reliability of the process is undocumented. For a method to be reliable, it is not only necessary to have different raters. There must also be a high agreement between those raters and there must be a high correlation between the raters and the algorithmic assessment. ICANN's methodology does not seem to have involved multiple raters, let alone in agreement with each other and having a high correlation with the algorithmic assessment. Finally, ICANN did not take into account linguistic evidence taken from real world language data, although such data is crucial to any valid evaluation of whether or not a particular pattern is sufficiently frequent and productive to avoid string confusion.

In contrast, to examine the string similarity between *hotels* and *hoteis*, we have applied a dual approach combining psycholinguistic experiments with corpus-linguistic analyses. The essence of this approach is that, through experiment and a psycholinguistic literature review, we first analyzed to what extent the visual similarity between the characters *l* and *i* may cause problems of word identification in words differing only in these characters (as compared to words differing only in other characters). Once we had analyzed what happens in the mind of the language user, we then analyzed real life language data to assess to what extent the language user is frequently exposed to words differing only in the characters *l* and *i*. Where this is the case, we have explained why visual word recognition does not cause any difficulties in this case.

This approach led us to make the following findings:

– In normal human reading, character misidentification is very uncommon. In order to induce errors in identification, experiments studying character identification must degrade the perceptibility of characters.
– A <u>psycholinguistic study</u> based on existing behavioral data on word recognition shows that behavioral evidence does not support the claim that readers are less sensitive to the difference between *l* and *i* than to the differences between other characters. The evidence does not support the view that visual similarity between the *l* and *i* characters is a cause of word confusion in ordinary circumstances.
– A <u>second psycholinguistic study</u> based on newly collected behavioral data from more than 1,600 participants in a worldwide online vocabulary study shows that the character

2

string *hoteis* is not confused with the character string *hotels* or *vice versa* in ordinary visual word recognition.
- A <u>corpus-linguistic study</u> involving a quantitative analysis of large English data sets shows that the English language includes a substantial number of words that differ from each other only in the alternation of *l* and *i*.
- A <u>second corpus-linguistic study</u> shows that the alternation of *l* and *i* is not only frequently occuring; it also occurs in common words. This explains why the alternation of *l* and *i* as observed in *hotels/hoteis* does not confuse the language user: he is frequently and repeatedly exposed to this pattern.
- Finally, a <u>quantitative analysis of a large English-Portuguese parallel corpus</u> shows that interlingual English-Portuguese orthographic neighbors presenting the alternation of *l* and *i* in plural noun endings is a reasonably frequent phenomenon.

This approach showed that the word pair *hotels/hoteis* does not cause user confusion. The patterns underlying the word pair *hotels/hoteis* explain why string confusion should not be expected and why behavioral data shows that the average, reasonable Internet user does not in fact become confused between the *hotels* and *hoteis* strings.

I.   Context

The company Booking.com B.V. (Booking.com) has applied to ICANN to operate the generic top-level domain (gTLD) .hotels in the Internet root zone. The company Despegar Online SRL has applied to ICANN to operate the gTLD .hoteis in the Internet root zone.

ICANN has informed Booking.com that it is of the opinion that the gTLD strings .hotels and .hoteis are confusingly similar. ICANN informed Booking.com that:

> *"After careful consideration and extensive review performed against criteria in Section 2.2.1.1. of the Applicant Guidebook, the String Similarity Panel has found the applied-for string (.hotels) is visually similarly to another applied-for string (.hoteis), creating a probability of user confusion."*

The two strings were put into a contention set by ICANN. This prevents both strings from being delegated.

On 22 March 2013, I advised that the language user is able to visually distinguish the words *hotels* and *hoteis*. My advice was based on a study of an English corpus of very frequent words.

On 7 June 2013 and 9 January 2014, ICANN published additional information on the process that was used by the String Similarity Panel in assessing the confusing similarity of applied-for gTLD strings.

I have analyzed ICANN's methodology and decision in view of this new information.

II.   Relevant Principles and Methodology

An analysis of the methodology that ICANN used to evaluate the similarity between letter strings allows me to conclude that ICANN's approach does not take the necessary account of behavioral and linguistic evidence (A.). Below, I explain why there is a need for a psycholinguistic and linguistic approach. I also explain the linguistic and psycholinguistic hypotheses underlying my analysis (B.). I clarify why this approach requires the expertise of a multidisciplinary team. Finally, I specify how this requirement has been taken into account in this report (C.)

A.   ICANN's standard and methodology for assessing confusing string similarity

I have examined and analyzed the following material from ICANN:

- ICANN's Applicant Guidebook, containing a description of the review methodology and ICANN's standard for assessing string confusion by the so-called String Similarity Panel;
- the qualifications of the String Similarity Panel and the expected review methodology as set forth in ICANN's expression of interest document available at http://archive.icann.org/en/topics/new-gtlds/eoi-string-sim-31jul09-en.pdf;
- the process description of the String Similarity Panel as posted by ICANN on 7 June 2013 as well as a letter of 18 December 2013 from the Panel's Manager to ICANN. This letter was said to provide *"a summary of the process, quality control mechanisms and some considerations surrounding non-exact contention sets for string similarity evaluation as requested by ICANN"* and;
- the list of applied-for gTLD strings as made available on https://gtldresult.icann.org/application-result/applicationstatus/viewstatus.

These documents show that ICANN's standard for assessing confusing string similarity is as follows:

> *"**Standard for String Confusion** – String confusion exists where a string so nearly resembles another visually that it is likely to deceive or cause confusion. For the likelihood of confusion to exist, it must be probable, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another string to mind, is insufficient to find a likelihood of confusion."*

ICANN's methodology was to use a proprietary algorithm (called SWORD) to evaluate the similarity between letter strings and supplemented the outcome of this algorithm with the judgment of a panel, the String Similarity Panel. While the details of this algorithm and process have not been made public, its results suggest that the algorithm uses a similarity metric based exclusively on visual character overlap. The final determination of similarity was left entirely up to the judgement of ICANN's String Similarity Panel. The background of the Panel's members and the methodology that was used are unclear. Also unclear is the basis on which the likelihood of confusion for the average, reasonable Internet user was analysed.

The aim of the outlined methodology is clearly to predict string confusion by human readers. Several aspects of the methodology show that *construct validity, i.e.*, the need for a methodology to measure what it actually claims to measure, was largely overlooked:

- First, there is no reference to any attempt to link the methodology to empirical evidence obtained by *experimental testing of string confusion in human readers*.
- Second, most of the evidence on human string confusion relates to experimental psychology literature. Given that the identity of the panel members is unknown, there is no clear basis on which to question the expertise of the panel members. However, it is remarkable that the panel's composition does not include behavioral scientists given its task of evaluating the behavior of the average, reasonable Internet user.
- Third, since the approach taken by ICANN uses human and algorithmic assessment of string similarity, it is surprising that the reliability of the process is undocumented. For the method to be reliable, it is not only necessary to have different raters, but also to have a high level of agreement between these raters and a high correlation between raters and the algorithmic assessment. ICANN's methodology does not appear to have involved different raters, let alone agreement between those raters or a high correlation between them and the algorithmic assessment.
- Finally, ICANN's approach does not take account of linguistic evidence taken from real world language data, despite the fact that such data is crucial to evaluate whether or not a certain pattern is sufficiently frequent and productive not to lead to string confusion.

This leads me to conclude that **no conclusion is possible based solely on the ICANN methodology** and that another approach is needed. In the next chapter we clarify what that approach should be.

B.   Need for a psycholinguistic and linguistic approach

Analyzing the likelihood of confusion of the average, reasonable Internet user when confronted with similar strings can only be done on the basis of real word data. This data can be obtained and analyzed through different methods. The data and analysis of one specific method will serve as a rater. If the data and analysis from various relevant methods are in agreement with each other and show a high degree of correlation, we can reach a valid conclusion about the likelihood of confusion of the average reasonable Internet user.

1. Our approach is a dual one. First, we make use of a **psycholinguistic approach** to determine whether or not, and to what extent, humans can distinguish character strings which differ only in the *l* and *i* characters. To that end, we use large behavioral datasets of visual word recognition performance. On the basis of this analysis, we gather behavioral evidence to determine the extent to which accurate recognition occurs under normal viewing conditions.

If this evidence shows that the similarity between character strings which differ only in the *l* and *i* characters does not hamper recognition, we go on to analyze whether a **corpus-linguistic analysis** explains this behavior. For this analysis, we use a linguistic corpus, *i.e.* a large and structured set of texts (nowadays usually electronically stored and processed), whose purpose is

to give a complete picture of a language. These structured set of texts are used to perform statistical analysis and hypothesis testing, checking occurrences or validating linguistic rules within a specific language territory (an intra-lingual corpus) or between different languages (an inter-lingual corpus). The analysis of a linguistic corpus will allow us to evaluate the frequency of the occurrence of the pattern underlying the word pair *hotels* and *hoteis* and to determine the extent to which the similar character strings belong to the regular lexicon of the language under study.

2. The **background** to this dual approach stems from **fundamental insights about the way reading proceeds and about the way language functions**.

Reading. Skilled human readers routinely identify all words in a text. Even the best computer-based recognition systems never achieve human accuracy. The human visual system is very different from computer vision systems. Also, the visual word recognition system is different from typical visual object perception. Analysis of brain activity during reading shows that the processing of written text is a highly specialized task that strongly activates the middle portion of the left *fusiform gyrus*, a specific region of the brain which is not strongly involved in the processing of other forms of visual information (Cohen et al., 2000, McCandliss, Cohen & Dehaene, 2003).

The process of becoming a skilled reader has much in common with learning to recognize faces. When we first see the faces of identical twins we may be confused, but through repeated exposure we learn to reliably distinguish between them. Equally, we are able to recognize that a familiar face belongs to the same person with or without glasses, with or without a beard or a mustache, with or without make-up, and so on.

Discriminating between characters is the basis of the reading process and involves a similar learning process. We learn that small visual differences, for instance between *l* and *i*, are always important, while, at the same time, we learn to discard large but non-meaningful differences, such as between uppercase *A* and lowercase *a*. After a few years of exposure to characters, nearly all humans become experts at this task. The exposure to characters continues and expertise grows throughout our lifetime. This is why Finkbeiner and Coltheart (2009) write that "*letters are highly overlearned visual patterns*".

Mueller and Weidemann (2012) give an overview of the research on human character recognition since the problem was first experimentally studied by Catell (1886). The study by Geyer (1977), which presented characters in lowercase Tactype Futura demi 5424, a very simple non-ornamental font, is interesting in our case because domain names are usually displayed as lowercase characters in a simple sans-serif type.

Geyer (1977) begins by noting that, in ordinary circumstances, human character identification is nearly flawless. He writes:

> "*One problem in the development of alphabetic confusion matrix data is limiting correct performance.* **Under normal viewing conditions, correct recognition is highly probable** *and a resultant confusion matrix is uninteresting.*"

6

To induce errors in character recognition, Geyer found, like all researchers in the field, that he had to create adverse circumstances for his participants. He adjusted the brightness and duration of the presentation of the characters such that participants were only able to achieve correct identification in half of the trials. To achieve this characters were presented very dimly and very quickly. Geyer calculated that, in these conditions, there was a 50% chance of correctly identifying *l* and a 34% chance of correctly identifying *i*. In addition, there was a 12% chance that an *l* would be identified as an *i* and an 18% chance that an *i* would be identified as an *l*. We must place these results in perspective: there were six characters with a lower chance of correct identification than *i* (*s, z, e, c, t,* and *f*) and four additional characters with a lower to equal chance of correct identification than *l* (*r, q, o,* and *u*). Moreover, there were 14 pairs more likely to confusion than *l/i* (*a/o, f/j, f/l, e/o, b/h, o/a, p/n, q/a, s/n, t/i, t/l, v/w, y/v,* and *z/x*).

Similar results can be found throughout literature. However, it is important to understand that these results present character identification at the absolute limits of visual perception. Even in these circumstances, many character pairs are more often confused than *l/i*.

So, while character identification can be affected under very adverse circumstances, such results do not tell us much about the confusion of characters within words in ordinary circumstances. In particular, we would like to know whether, and to what extent, humans can distinguish character strings which differ only in the *l* and *i* character. We will study this problem using large behavioral datasets of visual word recognition performance.

Language. Language is *structured* and *productive*. By *structured* we mean that there are basic elements which are combined to produce more complex elements. By *productive* we mean that a limited number of complex elements can be combined according to rules for the production of almost limitless coherent meaningful utterances.

Every language consists of a fixed set of phonemes (sounds) and graphemes (letters) that can be combined without limitation. This linguistic reality poses no problems to the language user, who is used to being confronted with words that differ from each other in only a single character. This does not prevent the language user from visually distinguishing these words so as to see them as different meaningful entities. Therefore, **string similarity is an inherent feature of all natural languages**.

In order to observe to what extent language users are able to distinguish between two character strings, one can **analyze to what extent the similar character strings belong to the regular lexicon of the language that is examined**. To do so, the most effective methodology is corpus linguistics. Corpus linguistics is a method of linguistic analysis that uses a collection of natural or "real word" texts known as corpus. Corpus linguistics offers a unique insight into the dynamic of language that has made it one of the most widely used linguistic methodologies (Baayen 2008, Johnson 2011, Linquist 2009, McEnery & Hardie 2011).

3. We will now clarify the **psycholinguistic and linguistic hypotheses** on which this approach is based.

For the **psycholinguistic analysis**, the task we will investigate is human lexical decision. In this task, participants have to press a button indicating whether a character string is known to them (WORD response) or whether it is unknown to them (NONWORD response). After the participant's answer is registered, another string is presented. Each string is presented only once to each participant.

The basic hypothesis behind this psycholinguistic approach is that if the alternation between *l* and *i* is NOT confusing, then the non-Portuguese language user, having an understanding of English, Dutch, French, German, etc., should be able to identify hotels as a WORD and hoteis as a NONWORD.

If the Internet user is unable to make the distinction between *l* and *i* in a character string only differing through *l/i* alternation, then the number of WORD responses to a nonword (*i.e.* the nonword stimulus) will approach the WORD responses to a word (*i.e.* the word stimulus). This would imply that the nonword stimulus is mistaken for the word stimulus. For instance, if the character string *hoteis* is mistaken for *hotels*, then the proportion of WORD responses to *hoteis* should approach the proportion of WORD responses to *hotels*, assuming that most English speaking participants will not know the Portuguese word *hotéis* (or at least would not classify it as a word in the test context). (

In other words, if readers of this text are able to distinguish the character strings *hotels* and *hoteis* in the paragraph above (and in the current paragraph), then the hypothesis of confusion should be rejected.

An improved version of the hypothesis can be made in probabilistic terms: If nonwords differing from words only by substitution of the character *i* for the character *l* evoke significantly more WORD responses than nonwords differing from words by substitution of *l* for any other character, then it is likely that the substitution of *l* by *i* evokes errors in word identification.

We can frame this hypothesis even more carefully in terms of the signal detection paradigm. In this paradigm, *sensitivity* indicates how readily a particular difference can be detected. This sensitivity can be measured parametrically by using the traditional d' measure, or non-parametrically by using the *A* index (Zhang & Mueller, 2005). The *A* index makes less assumptions about the structure of the underlying data and is more fit for our current report. *A* varies between 0 and 1, with a higher value indicating better sensitivity. In other words, if a character string is routinely mistaken for another character string, then sensitivity will approach 0. If a difference is always detected, sensitivity will approach 1.

It is important to note that, regardless of visual similarity, there may be a number of reasons why participants in the lexical decision task respond "WORD" to nonwords. For instance, participants may mistakenly press the wrong button, a nonword may actually be a word in their dialect or the nonword may be confused for another word by sound. Therefore, it is important to compare the sensitivity to a particular difference with a realistic baseline sensitivity level. Hence, the sensitivity to the *l/i* difference, such as in *hotels/hoteis*, must be compared with the sensitivity to the *l/~i* difference, where *~i* means any letter that is *not i*.

8

For the subsequent **corpuslinguistic analysis**, the basic idea behind this approach is that if a certain alternation is sufficiently frequent, and thus productive, in a language, there is no reason to accept that this alternation would be perceived by the language user as too similar to allow him to distinguish two strings differing only by that alternation.

As a matter of fact, the basic hypothesis can be defined as follows: **If the analysis of large computerized corpora shows us that a certain alternation occurs reasonably frequently in the language under study, it should be clear that strings differing only in this alternation are sufficiently distinct from each other to be recognized as different words by the language user.**

C.   Multidisciplinary team

The approach we describe under B. is multi-disciplinary and requires psycholinguistic as well as linguistic expertise. This explains our decision to call upon a psycholinguist to perform the first part of the study. **Dr. Emmanuel Keuleers** kindly agreed to put his excellent psycholinguistic expertise at our disposal and to do the experiments needed.

As a linguist with strong expertise in corpus-linguistics and quantitative language research, I performed the second part of the study and I was also responsible for the integration of the two analyses in this report.

III.   The analysis

In this section, we apply the twofold approach outlined under II. to the word pair *hotels* and *hoteis*. The first step is to collect behavioral data on the basis of psycholinguistic experiments (A.) to see to what extent the visual similarity between the characters *l* and *i* causes problems of word identification in words differing only in these characters. We then pass to the corpuslinguistic analysis (B.) of real life language data to see to what extent the language user is frequently exposed to words differing only in these characters.

A.   Psycholinguistic analysis

Two studies

In our first study, we analyze existing behavioral data on word recognition coming from the British Lexicon Project to study. For a detailed presentation of this materials, see attachment 3. This analysis is focused on all words having the same length but differing in just one letter.

In the second study we collected new behavioral data focusing more specifically on the word pair *hotels/hoteis*.

These two studies, performed by Dr. Emmanuel Keuleers, are detailed in attachment 5.

9

Our findings

The first study shows us that in normal human reading, character misidentification is very uncommon. This is apparent from both the academic literature and experiments studying character identification. Experiments show that the perceptibility of characters must be degraded to induce errors in identification.

Research using behavioral data does not support the hypothesis that the visual similarity between the characters *l* and *i* causes increased misidentification.

This was confirmed in the second study by Dr. Emmanuel Keuleers focusing on the visual similarity between the character strings *hotels* and *hoteis*.

The results of both studies suggest very strongly that character differences play a negligible role in ordinary word recognition. In contrast, linguistic differences inform decisions in a predictable manner.

B. Corpuslinguistic analysis

Three studies

First, we examined to what extent the alternation *l/i* is frequent in English and generates word pairs differing only by this alternation. To do so, we performed a **quantitative analysis of two general English word lists** to analyze to what extent the alternation *l/i* occurs in English since word lists give general information about the words belonging to the lexicon of a language (our first study).

If the alternation under study is not restricted to a limited set of word pairs, one can even go further and study what the frequency of the words affected by the alternation is. The more frequent these words are, the less marginal the alternation within that language is and the more language users will be confronted with/used to the alternation (our second study). For this second study, we analyzed a **frequency list based on a large monolingual corpus**, giving us information on the usage of word pairs in real language usage situations.

Since *hotéis* is a Portuguese word, one could also think of the word pair *hotels/hoteis* as an inter-lingual orthographic neighbor or cognate. By inter-lingual cognates, we mean words of two different languages that have identical or similar spellings. In many cases, they share the same origin (etymon). Since the word pair *hotels/hoteis* belongs to English and Portuguese, it is relevant to analyze to what extent bilingual word pairs of this type occur regularly between these two languages (our third study). To perform this analysis, we **examined a parallel corpus of Portuguese and English texts.**This should allow us to find out how many inter-lingual cognates exist between Portuguese plural noun ending in *–eis/-ais/-ois/-uis* (used with or without accents) and English words ending in *–els/-als/-ols/-uls*.

These three studies, performed by myself, are detailed in attachment 6.

Our findings

Our first study showed that English has quite a substantial number of word pairs differing only in the alternation *l/i*. Our second study showed that alternation *l/i* itself is not only a frequent pattern, but also that it occurs in frequent words. Finally, our third study showed that that English and Portuguese present a substantial number of inter-lingual cognates, i.e. completely analogous word pairs with exactly the same number of letters, differing only through the alternation of *l* and *i*. Most of these word pairs are quite frequent and concern the *ais/ail* alternation. 8 of them offer the *eis/els* alternation. As a result, language users who speak both English and Portuguese are used to the alternation of *l* and *i* between English and Portuguese.

The outcomes of our corpuslinguistic studies are thus consistent with and confirm the empirical behavioral data showing that language users who understand English and/or Portuguese are not confused by the alternation of *l* and *i*.

IV. Conclusion
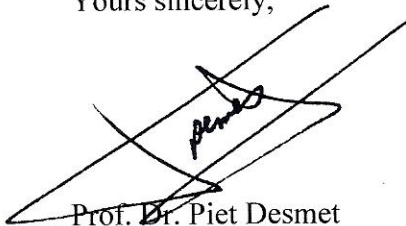
ICANN did not apply a valid scientific approach in addressing the issue of string similarity. Its decision to put *.hotels* and *.hoteis* in a contention set is based on an undocumented approach that did not take account of empirical behavioral data and linguistic evidence that is essential in assessing string similarity and the likelihood of confusion of the average, reasonable Internet user.

Our multidisciplinary approach, that is based on psycholinguistic experiments and corpuslinguistic analyses shows that there is no reason to believe that the word pair *hotels* and *hoteis* will be confusingly similar to the average, reasonable Internet user.
Empirical behavioral data on character confusion shows that several alternations (including the alternations *t/i*, *l/f*, *l/t*, *e/o* and *e/a*) are more likely to cause confusion than the alternation *l/i*. However, while ICANN put *.hotels* and *.hoteis* in a contention set, it did not consider word pairs that were differing from each other only by these more similar alternations to be confusingly similar (*parts/paris*; *maif/mail*; *srt/srl*; *vote/voto*; and *date/data*). The character alternations in these word pairs are at least as confusing as those in the *hotels/hoteis* word pair.

As a result, ICANN's conclusion that it is probable that confusion will arise in the mind of the average, reasonable Internet user when the *.hotels* and *.hoteis* strings are both delegated is both arbitrary, in that character pairs that are at least equally confusing as *l/i* are not considered confusingly similar, and contradicted by our analysis.

Yours sincerely,

Prof. Dr. Piet Desmet

11

ATTACHMENTS:

1.   **Curriculum Vitae Prof. Dr. Piet Desmet**

2.   **Curriculum Vitae Dr. Emmanuel Keuleers**

3.   **List of Materials Reviewed**

4.   **Relevant publications or sources referred to or cited in support**

5.   **Psycholinguistic analysis performed by Dr. Emmanuel Keuleurs**

6.   **Corpus-linguistic analysis performed by Prof. Dr. Piet Desmet**

ATTACHMENT 1 - CURRICULUM VITAE PROF. DR. PIET DESMET

**Full Professor of French and Applied Linguistics
(KU Leuven & KU Leuven Kulak - Belgium)**

Coordinator of the research team ITEC (*Interactive Technologies*)

Former Dean of the Faculty of Arts, KU Leuven Kulak

Contact information

KU Leuven Kulak
  Contact Information Redacted

Personal information
  Contact Information Redacted

Degrees

MA in Romance Philology, K.U.Leuven, 1987, maxima cum laude
BA in Philosophy, K.U.Leuven, 1987, magna cum laude
Teacher training French as a Foreign Language, K.U.Leuven, 1987, maxima cum laude
Ph.D. in Romance Philology (French linguistics), 1994, maxima cum laude with congratulations of the jury

Career

Research Assistant in French Linguistics, Department of Linguistics, KU Leuven, 1987-1994
Post-doctoral Research Fellow, Department of Linguistics, KU Leuven, 1994-1996
Associate Professor ('Docent') of French and Applied Linguistics, KU Leuven, 1996-1999
Associate Professor ('Hoofddocent') of French and Applied Linguistics, KU Leuven, 2000-2002
Professor ('Hoogleraar) of French and Applied Linguistics, KU Leuven, 2003-2006
Full Professor ('Gewoon Hoogleraar') of French and Applied Linguistics, KU Leuven, 2006-

Research

° Areas :   French & General Linguistics
              Applied Linguistics
              Corpus Linguistics
              Computer-Assisted Language Learning
              Foreign Language Learning & Second Language Acquisition

○ Coordinator of the research team ITEC *(Interactive technologies)*

○ Director of numerous research projects
  e.g. EU: Ling@tic (Interreg III), Cobalt (Interreg IV), GOBL (LLP), European Survey on
  Language competences (ESLC), etc.
  iMinds (Innovation in ICT): MAPLE (mobile learning), LLINGO (serious gaming),
  G@S (minigames), iRead+ (input enhancement), EDUTAB (tablets in education)
  Industrial research Fund: Adaptive learning environments
  Institute for Science & Technology: Baekeland (corrective feedback), e-testing, etc.
  KU Leuven: Idiomatic, Language Portal, Jurimatic, Lingu@flex, etc.
  Flemish government: SELOR (e-testing), OBPWO

○ Director of eleven Ph.D. theses (in Applied Linguistics – 6 completed and 5 running) and of
  numerous MA-theses in CALL and Foreign Language Learning

○ Author of about a hundred publications (books & articles in international peer-reviewed
  journals). For an overview, see https://lirias.kuleuven.be/cv?u=U0019561

○ Presenter at numerous international conferences (CALICO, WORLDCALL, EUROCALL,
  UNTELE, EDMEDIA, etc.) and organizer of different international conferences

○ Member of the Editorial Board of *ITL International Journal of Applied Linguistics*, of *Revue
  française de linguistique appliquée* and of *Le français dans le monde. Recherche &
  applications*.

○ Two spin-off companies:
    BLCC (Blended language learning for professionals)
    Telraam -> Indie Education -> Televic education (educational technology)

○ National Representative for Belgium within EUROCALL

IV. TEACHING

○ Different BA and MA Courses in French and Applied Linguistics, notably an MA course on
  CALL

○ Coordinator of the multimedia language lab at KU Leuven Kulak

V. MANDATES

○ Member of the Board of KU Leuven Research & Development

○ Vice-President of the *Alliance française West-Vlaanderen*

○ Member of the Board of *WTV Zuid West-Vlaanderen* (regional broadcasting company)

Further information

Home page Dutch: http://wwwling.arts.kuleuven.ac.be/franling/pdesmet/
Home page French: http://wwwling.arts.kuleuven.ac.be/franling_f/pdesmet

10 most relevant publications (last 5 years)

1. Montero Perez, M., Van Den Noortgate, W., Desmet, P. (2013). Captioned video for L2 listening and vocabulary learning: A meta-analysis. *System*, 41 (3), 720-739.
2. Vandewaetere, M., Cornillie, F., Clarebout, G., Desmet, P. (2013). Adaptivity in Educational Games: Including Player and Gameplay Characteristics. *International Journal of Higher Education*, 2 (2), 106-114.
3. Wauters, K., Desmet, P., Van Den Noortgate, W. (2012). Item Difficulty Estimation: an Auspicious Collaboration Between Data and Judgment. *Computers and Education, 58*, 1183-1193.
4. Vanderbauwhede, G., Desmet, P., Lauwers, P. (2011). The shifting of the demonstrative determiner in French and Dutch in parallel corpora: from translation mechanisms to structural differences. *Meta: Journal des Traducteurs, 56 (2)*, 443-464.
5. Vandewaetere, M., Desmet, P., Clarebout, G. (2011). The value of learner characteristics in the development of computer-based adaptive learning environments. *Computers in Human Behavior, 27*, 118-130.
6. O'Regan, B., Rivens Mompean, A., Desmet, P. (2010). From spell, grammar and style checkers to writing aids for English and French as a foreign language : challenges and opportunities. *Revue Française de Linguistique Appliquée, 15* (2), 67-84.
7. Wauters, K., Desmet, P., Van Den Noortgate, W. (2010). Adaptive Item-Based Learning Environments Based on the Item Response Theory: Possibilities and Challenges. *Journal of Computer Assisted Learning, 26* (6), 549-562.
8. Soylu, A., De Causmaecker, P., Desmet, P. (2009). Context and Adaptivity in Pervasive Computing Environments: Links with Software Engineering and Ontological Engineering. *Journal of Software, 4* (9), 992-1013.
9. Vandewaetere, M., Desmet, P. (2009). Introducing psychometrical validation of questionnaires in CALL research: The case of measuring attitude towards CALL. *Computer assisted language learning: an international journal, 22* (4), 349-380.
10. Desmet, P. (2007). L'apport des TIC à la mise en place d'un dispositif d'apprentissage des langues centré sur l'apprenant. *ITL: review of applied linguistics, 154*, 91-110.

Supervision of PhD's

Completed

1. Montero Perez, Maribel, Desmet P. (sup) , Peters, E. (cosup.) (2013). *Watch and Learn?! Five studies into the use and effectiveness of captioned video for L2 listening comprehension and vocabulary acquisition,* 300 pp.
2. Soylu, Ahmet, De Causmaecker, P. (sup.), Desmet, P. (sup.), Duval, E. (sup.) (2012). *Exploiting metadata, ontologies and semantics to design/enhance new end-user experiences for adaptive pervasive computing environments.,* 222pp.

3. Wauters, K., Van Den Noortgate, W. (sup.), Desmet, P. (cosup.) (2012). *Adaptive item sequencing in item-based learning environments*, 249 pp.
4. Vandewaetere, M., Clarebout, G. (sup.), Desmet, P. (cosup.) (2011). *Learner control for adaptive learning: The importance of learners' perceptions*, 268 pp.
5. Vanderbauwhede, G., Desmet, P. (sup.), Lauwers, P. (cosup.) (2011). *Le déterminant démonstratif en français et en néerlandais à travers les corpus: théorie, description, acquisition*, 470 pp.
6. Verleyen, S., Desmet, P. (sup.), Swiggers, P. (cosup.) (2005). *Fonction, forme et variation: analyse métathéorique de trois modèles du changement phonique au XXe siècle (1929-1982)*.

Running

1. Cavdar, Ilgün. *Plus-value didactique d'un environnement d'apprentissage électronique axé sur la compétence linguistique*
2. Cornillie, Frederik. *Effectiveness of corrective feedback for the development of second language grammatical competence in game- and task-based tutorial CALL: perceptions, usage and motivation*
3. Lagatie, Ruben. *Automatic generation of personalized feedback in electronic learning environments.*
4. Stockman, Caroline. *Technology acceptance and a teacher's interactional self-narrative.*
5. Vankeirsbilck, Pascale. *Repenser le subjonctif dans l'enseignement/apprentissage du FLE. Analyse théorique et expérimentale.*

Research funding granted in the last 5 years

Duration: 01.10.2007 - 30.09.2012
Budget: 600.000 euro
Promotor and general coordinator

Clarin
Flemish Ministry – EWI
Duration: 01.03.2010-30.09.29012
Budget: 45.000 euro
Co-promotor
Cobalt: COmmunicating and building Bridges thanks to the Acquisition of Languages through Technologies.
European project (Interreg IV A): EFRA-Funding and and cofunding by Min. of Flemish Community, Prov. West-Vlaanderen, VDAB, Forem, Indie Education, BLCC and Conseil Régional Nord-Pas-de-Calais
Duration : 01.03.2009 - 29.02.2012
Budget: 1.533.000 euro
Promotor and general coordinator

Language Learning in an Interactive Game Environment (LLINGO)
IBBT-ICON
Duration: 01.10.2009 - 30.009.2011
Budget: 450.000 euro
Promotor

Mobile, adaptive & personalized learning experience (MAPLE)
IBBT-ICON
Duration: 01.10.2009 – 30.09.2011
Budget: 528.000 euro
Promotor
Savoirs numériques 5962
Conseil regional – contract research
Duration: 01.06.2009 -31.12.2012
Budget: 100.000 euro
Promotor

European Survey on Language Competences (ESLC)
Fleminsh Ministry of Education
Duration: 24.03.2009-31.12.2012
Budget: 950.000 euro
Co-promotor

DPC. Dutch Paralell Corpus. A Multifunctional & Multilingual Corpus (Dutch-English, Dutch-French)
STEVIN - Nederlandse Taalunie
Duration: 01.05.2006 – 30.09.2009
Budget: 498.109 euro
Promotor

SELFIN- actualisering van de taalexamendatabank ATLAS
SELOR – contractonderzoek
Duration: 15.06.2007 – 14.06.2008
Budget: 175.000 euro
Promotor

SoE-project: Digitale (vak)didactiek voor toekomstige leerkrachten via USolv-IT en Franel. (= e-learning French and Dutch)
Associatie K.U.Leuven, School of Education
Duration: 15.12.2007 - 14.12.2008
Budget: 70.000 euro
Promotor

The Language Portal. "Taalportaal. Een elektronische oefen- en testomgeving voor de bachelor taal- en letterkunde".
OI K.U.Leuven
Duration: 01.02.2009 - 31.01.2011
Budget: 120.000 euro
Copromotor
JURI-Flex - De ontwikkeling van complexe juridische en heuristische oefentypes.
OI K.U.Leuven
Duration: 01.10.2007 - 30.09.2010
Budget: 120.000 euro

Research on the levels and knowledge of French in primary school education
Flemish Ministry of Education
Duration: 01.10.2006 - 31.12.2011
Budget: 500.000 euro
Co-promotor

Experience in research with and management of large-scale research infrastructure, possibly as part of a consortium or in an international context

Piet Desmet coordinates or has coordinated (during the last five years) the following large-scale projects in a complex, often international context: iRead+, G@S, LLINGO, MAPLE, Cobalt, DPC, SELFIN,

Contribution to policy-relevant research
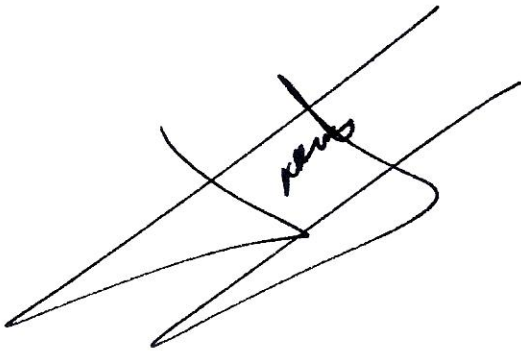
Different projects on language testing for the Flemish Ministry of Education and for the Belgian Ministry for Civil Affairs.

Awards

1988 - Laureate of the Travel grants competition (Reisbeurzenwedstrijd) of the Belgian Department of Education, Administration of Higher Education and Scientific Research.

2006 - Access to Language Education Award of CALICO

2008- Chevalier dans l'Ordre des Palmes académiques – French Ministry of Education

ATTACHMENT 2 - CURRICULUM VITAE DR. EMMANUEL KEULEERS

Dr. EMMANUEL KEULEERS
Research Fellow
Center for Reading Research
Department of Experimental Psychology
Ghent University, Belgium

Contact information

Contact Information Redacted

Degrees

- PhD in Linguistics, University of Antwerp, 2008

- Master in Theoretical and Experimental Psychology, Ghent University, 2000

Career

- October 2008-Present: Research Fellow — Department of Experimental Psychology, Ghent University.

- January 2008-July 2008: Researcher — CNTS Language Technology Group, University of Antwerp.

- January 2004–December 2007: PhD Researcher — Center for Psycholinguistics, University of Antwerp.

- November 2001–December 2003: Research Assistant — Center for Psycholinguistics, University of Antwerp.

Research Areas

- Psycholinguistics

  ◦ Visual Word Recognition

  ◦ Computational Models

  ◦ Morphology

  ◦ Crowdsourcing

- ◦ Megatudies
- Computational Linguistics
  - ◦ Word frequencies
  - ◦ Semantic Models
  - ◦ Corpus development
  - ◦ Memory-based learning

Membership of Professional Organizations

- Fellow of the Psychonomic Society
- Member of the Association for Psychological Science
- Member of the Belgian Association for Psychological Sciences

Teaching

- Different BA and MA courses in Psychology and Psycholinguistics.
- Regularly invited Lecturer at Research schools and workshops

Further information

Home page: http://crr.ugent.be/members/emmanuel-keuleers

10 most relevant publications (last 5 years)

1 van Heuven, W.J.B., Mandera, P., Keuleers, E., & Brysbaert, M. (2013). SUBTLEX-UK: A new and improved word frequency database for British English. The Quarterly Journal of Experimental Psychology.

2 Frost, R., & Keuleers, E. (2013). What Can We Learn From Monkeys About Orthographic Processing in Humans? A Reply to Ziegler et al. Psychological Science, 24(9), 1868–1869.

3   Kuperman, V., Drieghe, D., Keuleers, E., & Brysbaert, M. (2013). How strongly do word reading times and lexical decision times correlate? Combining data from eye movement corpora and megastudies. The Quarterly Journal of Experimental Psychology, 66(3), 563–580.

4   Keuleers, E., & Brysbaert, M. (2012). Detecting inherent bias in lexical decision experiments with the LD1NN algorithm. In G. Libben, G. Jarema, & C. Westbury (Eds.), Methodological and Analytic Frontiers in Lexical Research (pp. 231–248). John Benjamins Publishing..

5   Keuleers, E., Lacey, P., Rastle, K., & Brysbaert, M. (2012). The British Lexicon Project: Lexical decision data for 28,730 monosyllabic and disyllabic English words. Behavior Research Methods, 44, 287-304. doi: 10.3758/s13428-011-0118-4. doi (open access).

6   Keuleers, E., Diependaele, K., & Brysbaert, M. (2010). Practice Effects in Large-Scale Visual Word Recognition Studies: A Lexical Decision Study on 14,000 Dutch Mono- and Disyllabic Words and Nonwords. Frontiers in Psychology, 1. doi (open access).

7   Keuleers, E., & Brysbaert, M. (2010). Wuggy: A multilingual pseudoword generator. Behavior Research Methods, 42(3), 627-633. Award from the Psychonomic Society for Best Article of 2010 in BRM. doi, preprint.

8   Keuleers, E., Brysbaert, M., & New, B. (2010). SUBTLEX-NL: A new measure for Dutch word frequency based on film subtitles. Behavior Research Methods, 42(3), 643-650.

9   Keuleers, E. & Daelemans, W. (2007). Memory-based learning models of inflectional morphology: A methodological case study, Lingue e Linguaggio, 6(2), 151–174. doi, preprint.

10 Keuleers, E., Sandra, D., Daelemans, W., Gillis, S., Durieux, G., & Martens, E. (2007). Dutch plural inflection: The exception that proves the analogy. Cognitive Psychology, 54(4), 283–318.

Research funding granted in the last 5 years

- TRIBAL: Translation Recognition in Bilinguals Across the Lifespan. Awarded by Ministerio de Economía y Competitividad, MINECO, Gobierno de España. Members: Jon Andoni Duñabeitia, Emmanuel Keuleers, Stéphanie Massol, Aina Casaponsa, Ainhara Martí. (2012-2015) [PI: Jon Andoni Duñabeitia][45,000 EUR]

- Erasmus Mundus Basileus Staff Exchange Grant (2009), 3,000 EUR

Awards

- Award from the Psychonomic Society for Best Article of 2010 in Behavior Research Methods. Presented at the 51st Annual Meeting of the Psychonomic Society. St. Louis, November 18, 2010.

ATTACHMENT 3 - LIST OF MATERIALS REVIEWED

1. Materials for the first psycholinguistic study

Several studies have been conducted in which lexical decision data was collected for tens of thousand of words in different languages. In the English Lexicon Project, Balota et al. (2007) collected responses to 40,000 English words and the same number of nonwords, using over 900 participants, each responding to 3,500 trials. In a similar study, the French Lexicon project, Ferrand et al. (2009) collected responses to 38,000 French words and nonwords. Keuleers et al. (2010) collected responses for 39 Dutch speaking participants answering to 14,000 Dutch words and nonwords. Finally, in the British Lexicon Project, Keuleers et al. (2012) collected data for 28,000 English words and nonwords using 78 British English participants. These studies are widely accepted by the psycholinguistic community as reliable tools for the investigation of the visual word recognition system.

For the current analysis, we have used the **data from the British Lexicon Project**. In contrast to the English Lexicon project, the stimuli in the British Lexicon project were presented in lowercase. The characters *l* and *i* are visually more similar in lowercase than in uppercase, presenting a more stringent test of the effect of visual similarity between those characters on word recognition.

The data from the British Lexicon Project, on which we will base the current analysis, are publicly available in the Supplemental Data Archive of the Psychonomic Society, with document object identifier doi:10.3758/s13428-011-0118-4. The details of the experimental procedures, as well as an analysis of the reliability of the results, are given in Keuleers et al. (2012).

2. Materials for the three corpuslinguistic studies

Our **first corpus study** was based on **wordlists**. The two general English word lists we used are the following: EOWL and wordsEN.txt. Both are freely available, fully downloadable and thus open to quantitative analysis.

The word list wordsEN.txt is available from SIL, the international organization on language studies (originally known as Summer Institute of Linguistics) and a pioneer in the field of quantitative analysis of linguistic data. The list can be downloaded from: http://www-01.sil.org/linguistics/wordlists/english/

The second word list is the "English Open Word List" (EOWL), developed by Ken Loge, and available from: http://dreamsteep.com/projects/the-english-open-word-list.html

Both word lists contain more than 100,000 words each.

Since there is inevitably some overlap between the two lists, a unique word list was created from both lists, whereby case distinction was ignored.

The resulting file (wordlist-fuse.txt) contains **167,081 unique word forms**.

Word lists	Number of words
Summer Institute of Linguistics – wordsEN	109.582 words
English Open Word List	128.983 words
Fusion of both lists	167.81 **unique words**

For our **second corpus study** in which we study the frequency of word pairs based an the alternation of L/I we decided to use one of the most authoritative corpora for modern English, i. e. the *British National Corpus* (**BNC**). Its creation involved the collaboration of two universities (the University of Oxford and Lancaster University), a consortium of three publishers (Oxford University Press as the lead collaborator, Longman and W.&R. Chambers) and the British Library. BNC is a representative corpus of English covering 100 million words of written and spoken English from a wide variety of sources of the late 20th century.

As a matter of fact, we used the **BNC frequency lists** developed by Adam Kilgarriff, an internationally renowned expert in corpus linguistics and quantitative lexical analysis. For a detailed description, see http://kilgarrifff.co.uk The frequency lists are available at: ftp://ftp.itri.bton.ac.uk/bnc/

For our **third corpus study** based on a parallel corpus English-Portuguese, we selected the **English-Portuguese part of the JRC-ACQUIS- corpus**. This English-Portuguese sub corpus contains 600M words (300M words for each language). The Acquis Communautaire (AC) is the total body of European Union (EU) law applicable in the the EU Member States. This collection of legislative text changes continuously and currently comprises selected texts written between the 1950s and now. This corpus is coposed by the Joint Research Center of the European Commission.

To our knowledge, the Acquis Communautaire is the biggest parallel corpus in existence, if we take into consideration both its size and the large number of languages involved. The most outstanding advantage of the Acquis Communautaire - apart from being freely available - is the number of rare language pair combinations.

For more info, see: http://ipsc.jrc.ec.europa.eu

ATTACHMENT 4 - RELEVANT PUBLICATIONS OR SOURCES REFERRED TO OR CITED IN SUPPORT

Balota, D. A., Yap, M. J., Hutchison, K. A., Cortese, M. J., Kessler, B., Loftis, B., … Treiman, R. (2007). The English lexicon project. *Behavior Research Methods, 39*(3), 445–459.

Baayen, R.H. (2008). *Analyzing linguistic data*. Cambridge, Cambridge University Press.

Cattell, J. M. (1886). Über die Trägheit der Netzhaut und des Sehcentrums. *Philosophische Studien, 3*, 94–127.

Cohen, L., Dehaene, S., Naccache, L., Lehéricy, S., Dehaene-Lambertz, G., Hénaff, M.-A., & Michel, F. (2000). The visual word form area Spatial and temporal characterization of an initial stage of reading in normal subjects and posterior split-brain patients. *Brain, 123*(2), 291–307. doi:10.1093/brain/123.2.291

Ferrand, L., New, B., Brysbaert, M., Keuleers, E., Bonin, P., Méot, A., … Pallier, C. (2010). The French Lexicon Project: Lexical decision data for 38,840 French words and 38,840 pseudowords. *Behavior Research Methods, 42*(2), 488–496. doi:10.3758/BRM.42.2.488

Finkbeiner, M., & Coltheart, M. (2009). Letter recognition: From perception to representation. *Cognitive Neuropsychology, 26*(1), 1–6. doi:10.1080/02643290902905294

Johnson, K. (2011). *Quantitative Methods In Linguistics*. New York, Wiley.

Keuleers, E., Diependaele, K., & Brysbaert, M. (2010). Practice Effects in Large-Scale Visual Word Recognition Studies: A Lexical Decision Study on 14,000 Dutch Mono- and Disyllabic Words and Nonwords. *Frontiers in Psychology, 1*. doi:10.3389/fpsyg.2010.00174

Keuleers, E., Lacey, P., Rastle, K., & Brysbaert, M. (2012). The British Lexicon Project: Lexical decision data for 28,730 monosyllabic and disyllabic English words. *Behavior Research Methods, 44(1)*, 287–304. doi:10.3758/s13428-011-0118-4

Linquist, H. (2009). *Corpus Linguistics and the Description of English*. Endinburgh, Edinburgh University Press.

McCandliss, B. D., Cohen, L., & Dehaene, S. (2003). The visual word form area: expertise for reading in the fusiform gyrus. *Trends in Cognitive Sciences*, 7(7), 293–299. doi:10.1016/S1364-6613(03)00134-7

McEnery, T., & Hardie, A. (2011). *Corpus Linguistics: Method, Theory and Practice*. Cambridge, Cambridge University Press.

Mueller, S. T., & Weidemann, C. T. (2012). Alphabetic letter identification: Effects of perceivability, similarity, and bias. *Acta Psychologica, 139*(1), 19–37. doi:10.1016/j.actpsy.2011.09.014

Zhang, J., & Mueller, S. T. (2005). A note on ROC analysis and non-parametric estimate of sensitivity. *Psychometrika, 70*(1), 203–212. doi:10.1007/s11336-003-1119-8

ATTACHMENT 5 – PSYCHOLINGUISTIC ANALYSIS BY DR. EMMANUEL KEULEERS

This document details the studies that I performed, using the methodology, as explained in Prof. Dr. Desmet's synthetic expert report to which this document is attached.

In my first study, I analyzed existing behavioral data on word recognition coming from the British Lexicon Project to study. This analysis is focused on all words having the same length but differing in just one letter.

In the second study, I collected new behavioral data focusing more specifically on the word pair *hotels/hoteis*.

Dr. Emmanuel Keuleers

First study: Analysis of British Lexicon Project

We first selected all words from the British Lexicon Project for which 90% of participants gave a WORD response. In other words, we selected only stimuli for which a word response would be likely if visual similarity would lead to increased confusion. We then paired each of these words to nonwords having the same length but differing in just one letter (formally: having a Hamming distance of 1). Each of these pairs can be said to belong to a *substitution group*. For instance, the pair *bald/baid* belongs to the substitution group *l/i*, while the pair *elite/elire* belongs to the substitution group *t/r*.

For statistical analysis we considered only substitution groups with at least 10 items. We found 44 such substitution groups containing a total of 922 word/nonword pairs. The substitution group *l/i* contained 25 word/nonword pairs. The substitution group *i/l* contained less than 10 items, which we considered insufficient for reliable analysis.

We extracted the average accuracy for the word and nonword of each pair. In signal detection terms, word accuracy corresponds to the *hit rate*, while (1-nonword accuracy) corresponds to the *false alarm* rate. These quantities were used for computation of the A index, as described in Zhang & Mueller (2005).

Word	Nonword	WORD responses to word	WORD responses to nonword	A index
bold	boid	1.00	0.00	1.00
bulbs	buibs	0.97	0.00	0.99
fly	fiy	1.00	0.00	1.00
polls	poils	0.95	0.00	0.99
rolls	rolis	1.00	0.00	1.00
sly	siy	0.97	0.00	0.99
tingles	tingies	0.95	0.00	0.99
bled	bied	0.95	0.01	0.98
blew	biew	0.95	0.01	0.98
balm	baim	1.00	0.03	0.99
half	haif	0.95	0.03	0.98
old	oid	1.00	0.03	0.99
calls	cails	1.00	0.05	0.99
spindles	spindies	0.92	0.05	0.96
wells	weils	0.97	0.05	0.98
halts	haits	0.90	0.06	0.95
gold	goid	0.97	0.07	0.97
sold	soid	0.97	0.07	0.97
smalls	smails	0.93	0.08	0.96
angles	angies	0.92	0.10	0.95
bald	baid	0.97	0.10	0.96
dolls	doils	0.90	0.10	0.94
doll	doil	1.00	0.18	0.96
puddles	puddies	1.00	0.28	0.93
handled	handied	1.00	0.38	0.9
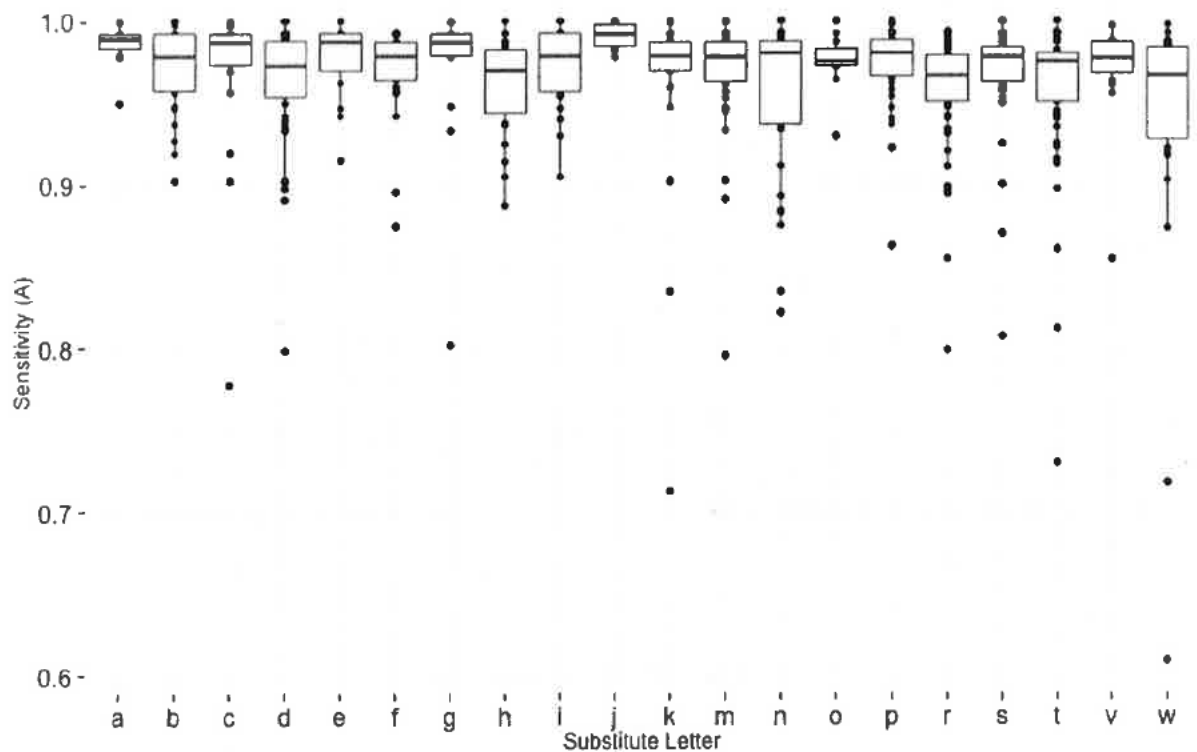
Figure 1 shows a box plot, comparing the sensitivity for all substitution groups for which the original letter was *l*. In general, the *A* indexes are very high for all substitutions. Median values for sensitivity, indicated by the horizontal lines in the boxes, were consistently over 0.95, indicating that none of the character substitutions caused a consistent misidentification of nonwords as words. A one-tailed *t*-test for samples with unequal variances was used to evaluate whether the mean sensitivity of items in the *l*/*i* substitution group (0.9728) was lower than the mean sensitivity of all items in other substitutions groups deriving from *l* (0.9648). The result of this test was non-significant ($t(31.237)=1.5589$). The non-parametric Mann-Whitney-Wilcoxon test yielded similar results, ($W=7631$, $p=0.8518$). Both tests point to the same result: Participants were not less sensitive to the difference between *l* and *i* characters than to pairs consisting of *l* and another character.

Table 1 shows the pairs included in the *l*/*i* substitution group. It is interesting to note that the variation in the number of WORD responses to nonwords does not appear to be a function of string similarity, which should be more or less equal for all forms. Instead, the results suggest that the proportion of WORD responses to a nonword reflects the degree to which participants can imagine that the string is actually a likely word. In other words, the variance in WORD responses to nonwords is most likely due to guessing.

Table 1: Word/nonword pairs included in the l/i substitution group, together with the number of WORD responses to the word and the confusable nonword, and the sensitivity (A index).

Second study: Results on the word pair *hotels/hoteis* using an online vocabulary test

In addition to the results outlined above, we collected specific data using an online English vocabulary test. The design of this test, known as the *Ghent University Vocabulary Test*, is very similar to a lexical decision experiment, but it is presented in an educational game-like format. The test is taken daily by hundreds of internet users from all over the world, using many different devices. As such, the participants to the test represent a varied sample of internet users. From February 24th until February 25th 2014, we used the website to test specifically for the character strings *hoteis* and *hotels*. For each participant, we randomly picked one of these strings to add to the 100 items they would normally see during the test. The added strings were not used for scoring their vocabulary. Over the course of a day, we collected 853 responses to the string *hoteis* and 802 responses to the string *hotels*. For the string *hotels* participants gave 797 WORD responses (99.4%). For the string *hoteis* participants gave 47 WORD responses (5.5%). This is lower than the baseline proportion of WORD responses to nonwords during the same period (8.9%), which can be attributed to guessing. Since *hotéis* is a word in Portuguese, we were interested in what Portuguese speaking participants answered to this form. Interestingly, out of the 10 participants we had from Brazil during this period, the 5 who were given the string *hotels* all gave a WORD response and out of the 6 who were given *hoteis* 5 gave a WORD response. In contrast, out of the 50 participants we had from Germany during the same period, not one of the 23 participants who were given *hoteis* gave a WORD response while all but one of the remaining 27 participants gave a WORD response to *hotels*. The results suggest very strongly that character differences play a negligible role in ordinary word recognition, whereas linguistic differences predictably inform decisions.

ATTACHMENT 6: CORPUS-LINGUISTIC ANALYSIS BY PROF. DR. PIET DESMET

This document details the corpus-linguistic analysis that I performed, using the methodology explained in the expert's report to which this document is attached.

Prof. Dr. Piet Desmet

First study: analysis of English wordlists - number of word pairs differing only in the alternation *l*/*i*

In order to establish the number of word pairs differing only in the alternation *l*/*i* – which we will call "minimal word pairs with *l*/*i*-alternation", a list of regex (regular expression) patterns was created. By regular expression we mean a sequence of characters that forms a search pattern. In this case, the characters under study (i.e. *l* and *i*) were neutralized to a dot. This allows us to identify the number of similar patterns.

The following **procedure** was used to collect the patterns. First, all occurrences of *l* and *i* were replaced by dots, hence neutralizing their meaning. A frequency list of unique word patterns was created, and only the minimal word pairs were stored in the file 'wordlists-patterns-li.txt'. A minimal word pair is a pattern matching at least two word forms after neutralization of *l* and *i*. This can be illustrated with the following example: *candies* and *candles* only differ in the fifth character position, indicating *i* and *l* respectively. The two words match the regular expression pattern /cand[li]es/, in which "[li]" represents one character, which is either *l* and *i*. Since we only compare the distinction *l* and *i*, we can just as well use a dot instead, as represented by the following record:

```
=== 2 cand.es
candies
candles
```

The record for each pattern consists of a header, showing the pattern, preceded by the number of words matching the pattern. The header is followed by a list of the possible words matching the pattern. On the basis of the word pattern file wordlists-patterns-li.txt all word forms matching the selected pattern are searched for in the fused word list and stored in wordlist-containing-li.txt. For each minimal word pair, a record was created.

This resulted in a list of **390 minimal word pairs with *l*/*i*-alternation, covering 788 word forms in total**.

Note that the above example shows a typical pattern of a minimal pair. However, the character opposition can occur at different positions in the same word, as illustrated by the following example, where "compiled" and "complied" match the pattern /comp[il][il]ed/:

```
=== 2 comp..ed
compiled
complied
```

This shows that the confusion is not limited to minimal pairs in the strict sense of the term.

Some **typical examples** are the following records:

```
=== 2 a..
ail
all
=== 2 ba..s
bails
balls
=== 2 cand.es
candies
candles
=== 2 ce...ng
ceiling
celling
=== 2 ent.t.es
entities
entitles
=== 2 fa..
fail
fall
=== 2 f..ed
filed
flied
=== 2 f..er
filer
flier
=== 2 hand.er
handier
handler
=== 2 mudd.ed
muddied
muddled
=== 2 padd.es
paddies
paddles
=== 2 ro...ng
roiling
rolling
=== 2 sp..t
spilt
split
=== 2 s..ver
silver
sliver
=== 2 ta..er
tailer
taller

=== 2 to..
toil
toll
```

Note that in a few cases, the pattern matches three words, as in the following example which includes the proper noun Mali:

```
=== 3 ma..
Mail
mali
mall
```

This data shows that English has a <u>substantial number of word pairs differing only in the alternation *l/i*</u>.

Second study: British National Corpus (BNC) -) frequency of the words affected by the alternation *l/i*

One could argue that the selected word lists also contain very low frequency words. *E.g.* the word "eider" (referring to a species of duck) in the following word pair is not that frequently used:

```
=== 2 e.der
eider
elder
```

Therefore, we also decided to analyze the BNC frequency lists. This should allow us to examine to what extent the minimal word pairs with *l/i*-alternation concern only very low frequency words or also involve words with a higher frequency.

We selected the BNC frequency list for words having a frequency of occurrence of 5 or more, meaning that the word occurs at least 5 times in the corpus. Below this frequency it is quite hard to do statements about word frequency with sufficient precision.

The BNC frequency list contains 4 columns per word form. Each column corresponds to the following fields: frequency, word, part-of-speech (*i.e.*, verb, noun, etc.), number of files the word occurs in.

In order to test the patterns *l/i*, we first created a list containing the unique word forms from BNC. In other words, we selected the second column of the BNC frequency file and stored the unique word forms in the file bnc-uwf.txt, which resulted in a list of 131,236 unique word forms. The number of unique word forms for BNC is smaller than those in the fused word lists. This can be explained, because we selected the frequency lists of BNC containing only words having a minimal frequency of 5 for the whole corpus.

We then created a pattern list from bnc-uwf.txt, which resulted in **514 patterns differing only in the *l/i* alternation.** These were stored in wordlists-patterns-*l*i-bnc.txt. Each pattern is preceded by the number of word forms matching the regex (regular expression) pattern. In total, in BNC there are **1,045 forms** matching the pattern *l/i*.

However, we should next verify to what extent the identified patterns correspond to English words as listed in a dictionary. For this operation, we took *Merriam Websters* as a reference (http://www.merriam-webster.com/), which also includes proper names and abbreviations. This matching operation resulted in a final list of **123 word pairs differing only in the *l/i* alternation.**

On the basis of the pattern list file wordlists-patterns-li-bnc.txt, all word forms in BNC, together with their frequency were selected and stored in the file wordlist-containing-li-bnc-freq.txt.

This list allows us to evaluate to what extent the word pairs with the *l/i* -alternation are actually used in reality. This information was mapped as set out in the examples below, where each word form is preceded by the BNC frequency.

The following examples show that the proper nouns Bali and Mali are less frequently used than the other words of the set:

```
=== ba..
7563 ball
1023 bail
159 bali
=== ma..
3405 mail
293 mall
166 mali
```

The following two examples show that *ladles* and *alms* are less frequently used than the alternative words of the same pattern:

```
=== .ad.es
3281 ladies
12 ladles
=== a.ms
4207 aims
86 alms
```

The following examples give clear information on the frequency, when compared to the same set in the first vocabulary lists:

```
=== comp..ed
855 compiled
368 complied
=== comp..es
105 complies
20 compiles
=== e.der
1354 elder
56 eider
=== ent.t.es
642 entities
119 entitles
```

The following records show that *fall* in its different forms is more often used than *fail*, but that both words are regularly used in different forms:

```
=== fa..
11119 fall
3370 fail
=== fa...ng
4745 falling
2264 failing
=== fa..s
3093 falls
1861 fails
```

These examples show that not only the alternation *l/i* itself is a frequent pattern, but that it also occurs in frequent words.

Third study: Parallel corpora English-Portuguese – frequency of inter-lingual English-Portuguese orthographic neighbors

In conducting our inter-lingual study, we followed the following procedure. We first selected all words ending in /[aeou]ls/ in an English sentence. Then, we selected all Portuguese words ending in /[aeou]is/ in the corresponding parallel sentence(s). These Portuguese words were then transformed to their English format ("i" maps to "l" and accents are discarded), and checked whether a match was found between the Portuguese and English word list. On the basis of this filter, **53 type pairs** (types: different word pairs) were found, representing 18,668 token pairs. The following list shows the 53 pairs sorted on reversed frequency, the most frequent pair on top. There are three columns used: rank number, frequency and type pair:

Rank number	Frequency	Type pair
1	9966	animais animals
2	5135	cereais cereals
3	2077	materiais materials
4	290	metais metals
5	221	minerais minerals
6	196	terminais terminals
7	122	hospitais hospitals
8	104	totais totals
9	94	cartéis cartels
10	66	individuais individuals
11	63	originais originals
12	51	manuais manuals
13	49	hotéis hotels
14	41	capitais capitals
15	35	tribunais tribunals
16	19	portais portals
17	18	canais canals
18	16	festivais festivals
19	14	fundamentais fundamentals
20	13	ideais ideals

Rank number	Frequency	Type pair
21	7	decimais decimals
22	6	animais animals
23	5	diagonais diagonals
24	5	quintais quintals
25	4	lintéis lintels
26	3	arsenais arsenals
27	3	decibéis decibels
28	3	finais finals
29	3	nanomateriais nanomaterials
30	3	ornamentais ornamentals
31	3	materiais materials
32	3	subtotais subtotals
33	3	transsexuais transsexuals
34	2	industriais industrials
35	2	marginais marginals
36	2	matériais materials
37	2	pastéis pastels
38	2	principais principals
39	2	cereais cereals
40	2	verticais verticals
41	1	aerosóis aerosols
42	1	corais corals
43	1	culturais culturals
44	1	dióis diols
45	1	géis gels
46	1	hoteis hotels
47	1	memoriais memorials
48	1	mongóis mongols
49	1	motéis motels
50	1	mutuais mutuals
51	1	pixéis pixels
52	1	radicais radicals
53	1	rivais rivals

It can be observed that English and Portuguese present a significant number of inter-lingual cognates, i.e. completely analogous word pairs with exactly the same number of letters, differing only through the alternation of l and i. Most of these word pairs are quite frequent and concern the *ais/ail* alternation. 8 of them offer the *eis/els* alternation.

As a result, language users who speak both English and Portuguese are used to the alternation of l and i between English and Portuguese. This confirms the empirical data that they are not confused by this alternation.

Annex 21.

Internet Corporation for Assigned Names and Numbers

Board Governance Committee (BGC) Meeting Minutes

1 August 2013

BGC Attendees: Cherine Chalaby, Bertrand de La Chapelle, Ram Mohan, Mike Silber, and Bruce Tonkin – Chair.

Other Board Member Attendees: Steve Crocker

Staff Attendees: John Jeffrey – General Counsel and Secretary, Megan Bishop, Michelle Bright, Elizabeth Le, Amy Stathos, and Christine Willett

Apologies: Chris Disspain and Ray Plzak

The following is a summary of discussion, actions taken and actions identified:

1. Approval of Minutes: The BGC approved the minutes of the last meeting.

2. Revised Recommendation for Reconsideration Request 13-4: The BGC reviewed and discussed the revised proposed recommendation for Reconsideration Request 13-4, which contains additional information consistent with the BGC's prior discussion on this issue. The BGC approved the recommendation for the New gTLD (generic Top Level Domain) Program Committee. Mike Silber abstained from consideration and voting on this matter. the BGC abstained. Two members were unavailable to vote.

    ○ Actions: Staff to submit the recommendation to the NGPC for consideration.

3. Reconsideration Request 13-5: The BGC received a briefing from Staff regarding Reconsideration Request 13-5 (the "Request"). The Request seeks reconsideration of staff action (based on the String Similarity Review Panel determination) placing the applications for .hotels and .hoteis into a string similarity contention set or alternatively, the requestor asks for a more detailed analysis and reasoning regarding the decision to place .hotels into a contention set. The BGC discussed timing of the request and asked that the recommendation more clearly specify what version of the Bylaws is applicable to the Request. The BGC determined that the requester failed to state the proper grounds for reconsideration because if failed to identify an established policy or process with which staff acted in contravention. The BGC approved a recommendation to the New gTLD (generic Top Level Domain) Program Committee denying the Request, which is to be posted on the ICANN (Internet Corporation for Assigned Names and Numbers)'s website. Ram Mohan and Mike Silber abstained from consideration of this matter and two members were not available for voting.

    ○ Actions: Staff to facilitate revisions being made to the Recommendation and submit the revised Recommendation to the NGPC for consideration.

4. Any Other Business: The BGC briefly discussed the nature of the available review mechanisms and whether any revisions need to be made; the BGC agreed to discuss at a later date.

Board (/en/groups/board)

Meetings (/en/groups/board/meetings)

Documents (/en/groups/board/documents)

Board & Chair Self-Appraisal (/en/groups/board/documents/appraisals)

Board Compensation Election (/en/groups/board/documents/ce)

Procedure Manual (/en/groups/board/documents/draft-procedure-manual-09oct12-en)

Resolutions Wiki (https://community.icann.org/display/tap/ICANN+Board+Resolutions)

Statements of Interest (/en/groups/board/documents/sois)

Audit Committee (/en/groups/board/audit)

Board Governance Committee (/en/groups/board/governance)

Compensation Committee (/en/groups/board/compensation)

Executive Committee (/en/groups/board/executive)

Finance Committee (/en/groups/board/finance)

Meeting Strategy Working Group (/en/groups/board/participation/mswg)

New gTLD Program Committee (/en/groups/board/new-gtld)

Risk Committee (/en/groups/board/risk)

Structural Improvements Committee (/en/groups/board/improvements)

ALAC (http://www.atlarge.icann.org)

ASO (http://aso.icann.org)

ccNSO (http://ccnso.icann.org)

GAC (http://gac.icann.org)

GNSO (http://gnso.icann.org)

IETF (/en/groups/ietf)

NRO (http://www.nro.net)

NomCom (/en/groups/nomcom)

RSSAC (/en/groups/rssac)

SSAC (/en/groups/ssac)

Technical Liaison Group (/en/groups/tlg)

Other Groups (/en/groups/other)

Past Groups (/en/groups/past)

Organizational Reviews (/en/groups/reviews)

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New gTLDs (http://newgtlds.icann.org)
Help

(/en/help)
Acronym Helper

Annex 22.

MEMORANDUM

I.   Executive Summary

This Memorandum examines the consequences of reversing the decision of putting .hotels and .hoteis in a contention set (hereinafter, the 'Decision').

It is Booking.com's conclusion that such reversal is in line with ICANN's mission and core values. As discussed in more detail below:

- There is no likelihood of confusion between .hotels and .hoteis;
- Competition would benefit from delegating both strings;
- The Internet community would benefit from it; and
- The position of other applicants is not impacted by the reversal of the Decision

Therefore, Booking.com is convinced that it is in the mutual interest of Booking.com, Despegar and the Internet community to allow the delegation of both .hotels and .hoteis.

II.   No risk of confusion

As brought forward in Booking.com's Reconsideration Request, there is no probability of user confusion if both 'hotels' and 'hoteis' were delegated as a gTLD string into the root zone:

- The difference between the letter "i" and the letter "l" clearly distinguishes the 'hoteis' and 'hotels' strings from each other;

- The intended use of the 'hotels' gTLD clearly distinguishes this gTLD from the 'hoteis' gTLD which is intended to solely target Portuguese-speaking audiences; and

- The Internet user will not be confused between 'hotels' and 'hoteis', irrespective of whether or not the Internet user is requesting information or whether the Internet user is receiving information.

In addition, several players in the hotel sector are making use of the words 'hotels' and/or 'hoteis', depending on the language users they address, 'hoteis' being Portuguese for 'hotels'. This does not lead to user confusion. A search on 'hotels' *c.q.* 'hoteis' on Internet search engines generates clearly different results with the results for 'hoteis' being predominantly in Portuguese. The difference in search engine results shows that Internet users and website developers are well aware of the difference between 'hotels' and 'hoteis' and are not confused by the existence of both terms.

This analysis is not rebutted by the content of the letter by Mr. Mark McFadden of 18 December 2013 to ICANN (and communicated by ICANN on 10 January 2014). Mr. McFadden merely gives a short explanation of the methodology that was used to perform the string similarity review, without indicating the background of the panelists and their degree of familiarity with English and other relevant languages. There are no signs that the evaluators who found .hotels and .hoteis similar constitute a representative sample. In

addition, it is not clear what the training referred to in the said letter consisted of or how the successful completion of training was measured.

In contrast, Booking.com has given ICANN a expert opinion by an experienced and highly respected linguist, scientifically showing that words that only differ in the alteration of 'l' and 'i' do not confuse the language users visually.

Finally, although Booking.com and Despegar are clear competitors who are active online (*infra*), their actions have never resulted in litigation with each other. Both parties accept each other's use of words relating to the hotel sector and are able to distinguish their offers without creating a risk of confusion. Booking.com has no knowledge of a case where a costumer was confused.

III.   Competition would benefit from the existence of several gTLDs related to the hotel sector

The core values that should guide the decisions and actions of ICANN show ICANN's willingness and commitment to look to market mechanisms as much as possible to promote and sustain a competitive environment. Booking.com is convinced that reversing the Decision would be in line with this goal and that competition would benefit from it.

A.   *Objectives of the gTLD program*

One of the objectives of the new gTLD program is to open up the top level of the Internet's namespace to foster diversity and to encourage competition, to create significant potential for new uses and benefit to Internet users across the globe. This reflects the fact that such pro-competitive diversity ultimately operates to the benefit of the Internet users.

As set out further below, given the nature of competition in the on-line hotels sector and of the activities of Booking.com and Despegar, the existence of separate .hotels and .hoteis gTLDs would be fully in line with this objective and consumer interests. Indeed, preventing such an outcome by retaining .hotels and .hoteis in a contention set would operate against the interests of both competition and consumers.

B.   *Competition in the on-line hotels sector*

Booking.com and Despegar are both active as online travel agencies. In particular, they offer consumers the opportunity to search and reserve hotels from travel service providers free of charge.

The travel sector, and within it hotel booking activities in particular, is highly dynamic, rapidly developing and extremely innovative. Competition is characterized by frequent innovation and change, particularly online. In a recent review, the UK competition regulator, the Office of Fair Trading ("OFT") stated:

> "online travel agency services, including hotel online booking, is a growing sector and is characterized by frequent introduction of new technology or platforms, such as apps (for example, specifically offering discounted accommodation for last-minute bookings), new business models such as the consumer-to-consumer website

AirBnB.com, developments such as TripAdvisor offering independent hotels and B&Bs the ability to participate in hotel price comparison on its website, and the expansion of search websites into the travel sector".[1]

As the OFT's findings illustrate, online services are of particular – and growing – importance within this rapidly moving and changing sector. This is confirmed by industry and customer surveys. In 2010, one industry report, the PhoCusWright European Consumer Travel Report, found that in Europe around 60% of consumers conduct online searches when comparing and choosing travel products.[2] In 2012, the same report found that around 64 per cent of UK customers booking travel services visit at least three websites in that context.[3] And according to a Eurobarometer survey, a majority of those who took a holiday lasting at least four nights in 2011 used the internet to make their arrangements.[4]

Indeed, online services are so important in the travel sector that – unusually – competition regulators accept that the online distribution of travel services may now be sufficiently distinct to constitute a separate economic market from the distribution of travel services through traditional off-line of "bricks and mortar" travel agents.[5] In a recent merger review, the OFT recorded that in the course of its market survey:

> "none of the third parties contacted by the OFT raised the point that bricks and mortar channels should be considered in the same market as online travel services".[6]

C. Coexistence will strengthen both Booking.com and Despegar as competitors

1. Stronger competitors generally

In order to compete successfully, any online business – but particularly one operating in a sector as dynamic rapidly changing as online hotel booking – must develop a clear, distinctive and differentiated identity that sticks in the minds of consumers and sets it apart from its competitors. This is important not only to the business itself, but to the customers that use and rely on it. Building up a strong distinctive brand in a highly competitive environment has been crucial to the success of Booking.com, and Despegar has pursued a similar strategy.

---

[1] OFT Notice *Hotel online booking: Notice of intention of accept revised commitments to remove certain discounting restriction for Online Trave Agents*, OFT 1514, 20 December 2013, para. 3.22, p. 18 (**Exhibit 1**).

[2] European Commission decision in Case M.6163 Axa/Permira/Opodo/Go Voyages/Edreams, 30 May 2011, para 27 ((more specifically 59% of French consumers, 63% of German consumers and 61% of UK consumers) (**Exhibit 2**).

[3] *Anticipated acquisition by Priceline.Com Incorporated of Kayak Software Corporation*, ME/5882-12, para. 91 (**Exhibit 3**).

[4] Flash Eurobarometer 334, "Attitudes of Europeans Towards Tourism", p. 22 (**Exhibit 4**).

[5] See, eg, the European Commission decision in Case M.6163 *Axa/Permira/Opodo/Go Voyages/Edreams*, 30 May 2011, para 28, p. 6 ("it follows from the market investigation that the distribution of leisure travel services through online channels might constitute a separate market.") (**Exhibit 2**). See also, the OFT decision in *Anticipated acquisition by Priceline.Com Incorporated of Kayak Software Corporation*, ME/5882-12, para 21, p. 5 ("the OFT has … assessed this transaction on the basis of online travel services") (**Exhibit 3**).

[6] *Anticipated acquisition by Priceline.Com Incorporated of Kayak Software Corporation*, ME/5882-12, para. 21, p.5 (**Exhibit 3**).

In this context, access to new gTLDs creates a new and significant opportunity for Booking.com and Despegar to further raise their profiles and offer clearly defined and easy to locate services to consumers. Both will be better competitors and better providers of services to the customers they serve if they are allowed to control their own gTLD destinies via access to an appropriate gTLD. With its focus on South American customers and market, the .hoteis gTLD is particularly suited to Despegar and reflects local linguistic traditions and needs. Booking.com has, in contrast, a primary focus on the U.S. (with its strongly Anglo-Saxon traditions) and other English-language markets; the .hotels gTLD is particularly appropriate.

By contrast, forcing the well-established and linguistically distinct concepts of "hoteis" and "hotels" into a single gTLD, would be a profoundly anti-competitive outcome. Either, one of Booking.com and Despegar will not have access to its desired gTLD (and the opportunities that represents to improve their service offer) or the two may end up sharing the same gTLD, reducing differentiation between them and potentially actually causing customer confusion.

2. *Stronger competitors vis-a-vis one another*

Booking.com and Despegar target the same group of customers: travelers with Internet access seeking hotel information and bookings. They also operate similar business models: both Booking.com and Despegar offer online search and reservation services, which are free of charge for the customer. Their search services are easily accessible to all Internet users across the globe. Reservations can be made using one of the major credit cards. In effect, services offered on booking.com and despegar.com are to this extent interchangeable.

It is true that Booking.com's largest markets are in the U.S. and Europe, while Despegar business is focused on Latin America. Despite these different focuses, however, the two ultimately target overlapping customer groups. Despegar specifically targets U.S. customers via the despegar.us URL and via the "USA" section on despegar.com, while Booking.com makes its main website available in two different Portuguese versions, one for customers from Portugal[7] and one for customers from Brazil[8]. Both offer search and reservation services in various languages, with Despegar offering English language services and Booking.com offering Spanish[9] and Portuguese[10] options (among over 40 languages in total). This reflects the fact that, while markets for travel services have traditionally been seen as national in scope due to language differences, online services are breaking down those barriers and providers are seeking to be present across formerly separate markets.[11]

The scope for competition between the two – and the need for clear differentiation – is further illustrated by evidence showing that consumers typically visit multiple sites in the context of

---

[7] http://www.booking.com/index.pt-pt.html?aid=7342726;sid=0ffa5452375478ef0a2cb6061f8b03c4;dcid=1

[8] http://www.booking.com/index.pt-br.html?aid=7342726;sid=0ffa5452375478ef0a2cb6061f8b03c4;dcid=1

[9] http://www.booking.com/index.es.html?aid=7342726;sid=0ffa5452375478ef0a2cb6061f8b03c4;dcid=1

[10] http://www.booking.com/index.pt-pt.html?aid=7342726;sid=0ffa5452375478ef0a2cb6061f8b03c4;dcid=1

[11] See, e.g., *Anticipated acquisition by Priceline.Com Incorporated of Kayak Software Corporation*, ME/5882-12, paras. 51 and 52, pp. 11 and 12: the parties submitted that "because services are internet based they can be provided globally and are not constrained by national or regional boundries", but noted that the European Commission had "previously defined the markets for the online distribution of travel services as national in scope" and had "cited language barriers as the primary reason for this" (**Exhibit 3**).

research and bookings in this sector. As mentioned, the PhoCusWright 2012 European Consumer Travel Report said that around 64 per cent of UK customers booking travel services visit at least three websites when comparing and choosing travel products.

In the context of this specific rivalry between Booking.com and Despegar – as well as in the general market context described above – the opportunity to have access to the separate .hotels *casu quo* .hoteis gTLDs creates new and significant opportunities to further differentiate and identify their services based on clear independent identities. Forcing these two competitors to fight for control of a gTLD or share a single gTLD, will reduce these opportunities for greater rivalry in the market and may result in more confused communications to customers.

D. *Competitive forces will prevent confusion*

Given the current competitive environment in the online hotel reservation sector, both Booking.com and Despegar will have every incentive to use their gTLDs as a distinctive competitive factor. Booking.com and Despegar have every incentive to maintain their strong and differentiated brand perceptions and therefore to operate the .hotels and .hoteis gTLDs in a way that ensures the continued distinctiveness of their brand.

In light of this demand for online travel services and the customer's preference to compare prices of multiple online travel agents, Booking.com and Despegar will develop their gTLDs into distinct and reliable platforms for online travel search and reservation services. This will spur competition to the benefit of Internet users across the globe.

IV. The Internet community benefits from the introduction of TLDs in different languages

With approximately 70% of Internet users around the world being non-English speakers[12], ICANN has recognized the importance of having information and domain names for Internet users in their native language. In this respect and in line with ICANN's core values 1, 4 and 6 as laid down in ICANN's Bylaws, the GNSO considered that expanding the domain name space to accommodate the introduction of both new ASCII and internationalized domain name (IDN) TLDs would give end-users more choice about the nature of their presence on the Internet. In addition, users may be able to use domain names in their language of choice. These were key drivers for the introduction of new gTLDs.[13]

In order to reach this goal, it was also considered important for ICANN to use different languages in order to reach as many potential applicants as possible, particularly as the goal is to solicit applications for new IDN gTLDs as well as ASCII.[14]

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[12] New gTLD IDN Program Fact Sheet, http://www.icann.org/en/resources/idn/idns-fact-sheet-04apr12-en.pdf

[13] GNSO Final Report on the Introduction of New Generic Top-Level Domains, 8 August 2007, para. 13 and recommendation 1, para. 7

[14] Summary of ICANN Generic Names Supporting Organisation's (GNSO) Final Report on the Introduction of New Generic Top Level Domains (gTLDs) and Related Activity (29 October 2007), p. 10

This shows the emphasis that ICANN (rightfully) puts on making the Internet and the domain name system more global and understandable through the use of local languages in the domain name system.

The decision to put .hotels and .hoteis in a contention set does not match with this goal. Internet users would indeed benefit from having information on hotels in their own/preferred language and accessible through domain names in that language. As the Decision implies that ICANN will only allow either the .hotels or the .hoteis gTLD, this means that either the English language community or the Portuguese language community will forever be deprived of a gTLD related to hotels in their own language. This does not benefit ICANN's goal to make the domain name system more global.

That is why reversing the Decision would also benefit the internationalization of the Internet and domain name system.

V.   No impact on the position of other applicants

No other applicants or gTLD operators are impacted by the decision to put .hotels and .hoteis in a contention set or by the reversal of this decision. Reversing the Decision would not impact any applicants other than Booking.com and Despegar. Reversing could only have had an impact on the formation of contention sets and the parties involved in such formation. As demonstrated below, no such impact can exist in relation to .hotels and .hoteis.

A.   *Theoretical impact on contention sets*

The only impact on other applicants that could have existed relates to the hypothesis of indirect string contention. Two strings are in indirect contention if they are both in direct contention with a third string, but not with one another (Applicant Guidebook, Module 4-3).

Strings that are in indirect contention will be put in the same contention set as long as the direct contention with the third string continues to exist. For example:

-   string A is in direct contention with string B
-   string B is in direct contention with string C
-   string A and string C are not in direct contention, but only in indirect contention, because of the contention of both strings with string B.

If string B is withdrawn (*e.g.* because of a successful objection), strings A and C can both be delegated as they are not in direct contention and the indirect string contention is removed.[15] In this scenario, the applicants for strings A and C may have an interest in joining forces against string B and both file an objection against string B or buy string B out through negotiations.

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[15] See also, Applicant Guidebook, Module 4-7.

B. No possible impact in the present case

In the present case .hotels and .hoteis were found in direct contention by the String Similarity Review Panel.

Indirect string contention between .hotels *casu quo* .hoteis on the one hand and a third party string on the other hand could theoretically have existed if either the .hotels or the .hoteis string were considered confusingly similar with third party string X (following an objection invoking string similarity of the third party string X with either .hotels or .hoteis). The third party string X would be either in direct contention with the .hotels string and in indirect contention with the .hoteis string, or in direct contention with the .hoteis string and in indirect contention with the .hotels string.

In our example, a successful objection by the holder of string X against only the .hotels string, would result in:

- direct string contention between string X and the .hotels string; and
- indirect contention between string X and .hoteis.

In this hypothetical example, reversing the Decision would have as a consequence that the indirect string contention between string X and .hoteis ceases to exist. The same would happen if the application for the string in direct contention (.hotels in our hypothetical example) is withdrawn or rejected (*e.g.* following a successful objection on other grounds). In other words, reversing the Decision would only have a relative impact on the objector, as the objector does not control the continued existence of indirect string contention.

Looking at the objections that have been filed against Booking.com's .hotels application and Despegar's .hoteis application, respectively, none of the objectors would be impacted by reversing the Decision.

The following objections were filed against Booking.com's .hotels application:

- String confusion objection by Hotel Top-Level-Domain S.a.r.l. for alleged confusing similarity with .hotel;
- Community objection by HOTREC, Hotels, Restaurants & Cafés in Europe; and
- Community objection by Hotel Consumer Protection Coalition.

The same objections were also filed separately against Despegar's .hoteis application, by the same parties.

This shows that 1) only Hotel Top-Level-Domain S.a.r.l. invoked string similarity with an applied-for gTLD on the one hand and the .hotels and .hoteis strings on the other hand; and 2) Hotel Top-Level-Domain S.a.r.l. was not aiming at indirect string contention between .hotels *c.q.* .hoteis and another gTLD. Had it only objected to one of the two, it would have aimed at indirect contention with the other. However, it objected to both to keep both in the same contention set and at the end attempt to eliminate them, either based on the alleged community priority of its own application, or through negotiation or auction.

The string confusion objections filed by Hotel Top-Level-Domain S.a.r.l. were both dismissed. Hotel Top-Level-Domain S.a.r.l. subsequently tried to reverse the decision that

.hotels and .hotel are not confusingly similar and filed a Request for Reconsideration with ICANN (Reconsideration Request 13-6). Hotel Top-Level-Domain S.a.r.l. did not file a Request for Reconsideration against the decision in the .hoteis / .hotel case and the deadline for filing such request has lapsed.

On 5 November 2013, the NGPC issued a resolution rejecting Reconsideration Request 13-6. The Minutes of the relevant NGPC meeting were posted on 21 November 2013. We are not aware of any request for a Cooperative Engagement Process or an Independent Review Process that was filed by Hotel Top-Level-Domain S.a.r.l. As the deadline for filing such requests has now lapsed, the Expert Determinations ruling that .hotel is not in contention with either .hotels or .hoteis are final.

As a result, there is no risk for another applicant to be impacted by a reversal of the Decision.

List of Exhibits:

Exhibit 1   OFT Notice *Hotel online booking: Notice of intention of accept revised commitments to remove certain discounting restriction for Online Trave Agents*, OFT 1514, 20 December 2013

Exhibit 2   European Commission decision in Case M.6163 Axa/Permira/Opodo/Go Voyages/Edreams, 30 May 2011

Exhibit 3   OFT, Anticipated acquisition by Priceline.Com Incorporated of Kayak Software Corporation, ME/5882-12

Exhibit 4   Flash Eurobarometer 334, "Attitudes of Europeans Towards Tourism"; March 2012

Exhibit 1.

Hotel online booking: Notice of intention to accept revised commitments to remove certain discounting restrictions for Online Travel Agents

20 December 2013

OFT1514

CONTENTS

Annexes (please note that these annexes are available separately)

Annexe 1 - Revised Commitments

Annexe 2 – The OFT's investigation and industry background (as previously set out in *OFT1500*)

Annexe 3 – The OFT's competition concerns and the Commitments (as previously set out in *OFT1500*)

Annexe 4 - Summary of responses to the Consultation

1   EXECUTIVE SUMMARY

1.1.   Following the launch of a formal investigation in September 2010, on 31 July 2012, the Office of Fair Trading ('OFT') issued a Statement of Objections alleging that Booking.com B.V. ('Booking.com') and its ultimate parent company priceline.com Incorporated ('Priceline'); Expedia, Inc ('Expedia'); InterContinental Hotels Group plc ('IHG') and Hotel Inter-Continental London Limited ('IH London') (the then owner of the Intercontinental London-Park Lane hotel ('ILPL')) (the 'Parties' and each a 'Party') have infringed Chapter I of the Competition Act 1998 (the 'Act') and Article 101 of the Treaty on the Functioning of the European Union ('TFEU') in relation to the online offering of 'Room-Only'[1] hotel accommodation bookings by online travel agents ('OTAs').

1.2.   The Statement of Objections alleged that Booking.com and Expedia each entered into separate arrangements with IHG and ILPL which restricted each OTA's ability to discount the rate at which Room-Only hotel accommodation bookings are offered to consumers.

1.3.   The OFT's competition concerns are as follows:

- **Current restrictions on discounting limit competition on room rates:** when OTAs face the current restrictions on discounting a hotel's Room-Only accommodation, there is likely to be limited, if any, competition on the offer of room rates between OTAs and between OTAs and the hotel's direct online sales channel for those hotel accommodation bookings (that is, intra-brand competition).

- **Current restrictions on discounting may increase barriers to entry**: the current restrictions on discounting may create barriers to entry to the extent that they prevent new OTAs from entering the market, and/or achieving sufficient scale (with discounted rates for Room-Only hotel accommodation).

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[1] 'Room-Only' means hotel accommodation that is offered on a standalone and/or individually priced basis, that is, not as part of a Package (see further paragraph 2.9 in Annexe 2). 'Room-Only' can include ancillary non-travel offers, such as breakfast. 'Room-Only' does not include hotel accommodation which is offered on an opaque basis, including where the accommodation booking offered on an opaque basis is offered on a standalone and/or individually priced basis (see further paragraph 2.13 in Annexe 2).

- **To the extent that similar discounting restrictions are replicated currently in the market, then any prevention, restriction or distortion of competition is further exacerbated**: although the OFT has not investigated the extent to which similar discounting restrictions are replicated in the market, the OFT understands that the alleged practices are potentially widespread in vertical distribution arrangements in the industry. In principle, a market in which discounting restrictions are prevalent is likely to be characterised by significant limits to price competition and barriers to entry.

1.4.   In order to address the competition concerns of the OFT and assist with bringing the investigation to a close, the Parties offered commitments (the 'Commitments') to the OFT that they would modify their behaviour in accordance with the following key Principles:

- **Hotel room discounts offered by OTAs:** OTAs would be free to offer reductions off headline room rates,[2] for example by way of discounts, vouchers, rewards and/or cash back, funded by their commission revenue or margin to members of a 'closed group', for instance in the context of membership or loyalty schemes.[3] Eligibility for such discounts would be dependent on the end-user making the booking having joined the closed group and having made a single previous booking (which is/has become non-refundable) after the effective date of the Commitments of any hotel room with that OTA.

- **Hotel room discounts offered by hotels:** Hotels would also be free to offer reductions off their own headline rates to closed group members on the same basis as OTAs.

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[2] Under the Commitments, 'headline room rate' means the room-only headline hotel room rates set by the relevant hotel partner for its rooms. It refers to the published retail rate for a room at a hotel on a particular night at a given point in time.

[3] Joining a closed group is intended to be a relatively low threshold, which may require only the entry of certain personal details online. This means that consumers would not be disincentivised from joining several groups due to onerous joining mechanisms. Depending on the OTA offering the scheme, no purchase may be required to join the closed group itself (as opposed to being eligible for discounts).

- **Advertising of hotel room discounts:** OTAs would be free to publicise information regarding the availability of discounts in a clear and transparent manner, including to price comparison websites and meta-search sites (that is, to members and non-members). However, OTAs cannot publicise information regarding the specific level or extent of discounts for any IHG hotel room or any other information which would allow a discounted retail rate to be calculated (including, for the avoidance of doubt, the discounted rate itself) to non-members. Similarly, other (non-IHG) hotels may prevent OTAs from publicising such information for their hotel rooms to non-members.

1.5. Other restrictions, such as retail rate most-favoured nation provisions ('MFN provisions'),[4] have not been considered by the OFT and are not the subject of the Commitments, save to the extent that such restrictions could prevent[5] either hotels or OTAs from offering such discounts as are allowed for by the Commitments.[6] This is to ensure the efficacy of the Commitments and avoid the potential for any distortive effects. Thus, under the Commitments the OTA Parties may not prevent hotels from operating on the basis of arrangements which are consistent with the Principles, that is, from offering discounts in an equivalent manner to OTAs.

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[4] Under such MFN provisions, a hotel agrees to provide an OTA with a hotel reservation for that OTA to offer to end-users at a booking rate which is no less favourable than the lowest booking rate displayed by other online distribution outlets. This is also known as 'Rate Parity'. This guarantees the OTA the lowest booking rate at least in relation to its distribution channel (that is, it cannot be undercut).

[5] This could be indirect, for example if a hotel is required to offer an OTA the same discounted booking rate as the hotel or another OTA is offering to closed group customers.

[6] The adjustment of MFN or equivalent provisions required by the Revised Commitments is a minimum standard only. The Revised Commitments would not affect any existing contractual arrangements under which a hotel can offer discounts, or allow its other OTA partners to do so. For the avoidance of doubt, this would mean, amongst other things, that if discounting by that hotel or discounting by other OTAs of that hotel's accommodation is currently outside the scope of any MFN provisions, this would be unaffected by the Revised Commitments. The Revised Commitments also do not affect the ability of hotels and OTAs to agree additional discounting rights and adjustment of MFN or equivalent provisions that go beyond the Principles set out in the Revised Commitments.

1.6.   The Parties proposed that the Commitments would apply to bookings made by UK residents[7] for rooms in hotels located in the EU, and would remain in force for a period of three years.

1.7.   The OFT, pursuant to section 31A of the Act, conducted a consultation exercise (the 'Consultation') to seek views on the Commitments offered by the Parties. This took the form of publication of a Notice to accept binding Commitments issued on 9 August 2013 (*OFT1500*).[8]

1.8.   In the light of the representations submitted to the OFT pursuant to the Consultation and further developments (including the OFT's further consideration of the sector), the OFT requested from the Parties, and has received, amendments to the Commitments (the 'Amendments' and, combined with the Commitments, the 'Revised Commitments').[9] Specifically, the Parties have offered the following Amendments:

- **Hotel closed group discounting**: Amendments have been made to clarify that the Commitments envisage hotels being able to offer discounts in an equivalent manner to OTAs.[10] These Amendments have been offered because the OFT received a number of queries about the extent to which the Commitments have an impact on the ability of hotels to offer discounts to closed groups.

- **Geographic scope:** An amendment to the geographic scope of the Commitments has been made to the effect that they would apply

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[7] Under the Commitments, 'UK resident' meant a consumer who has a UK address, a UK telephone number or a UK registered credit card. For the avoidance of doubt, the nationality or legal residency or tax status of the individual is irrelevant.

[8] www.oft.gov.uk/shared_oft/ca-and-cartels/oft1500.pdf

[9] The Parties have offered the Revised Commitments in the understanding that the OFT will close its investigation in this case without any finding of infringement and the offering of the Revised Commitments by the Parties does not constitute an admission of wrongdoing by the Parties.

[10] However, unlike OTAs, hotels would not fund such discounts using commission revenue or equivalent margin. For further details, see paragraph 3.17.

to bookings made by European Economic Area ('EEA') residents[11] for rooms in hotels located in the UK, rather than to bookings made by UK residents for rooms in hotels located in the EU.

- **Duration:** An amendment has been made to specify that the Revised Commitments would remain in force for a period of two years, rather than three years.

1.9. The draft text of the Revised Commitments is set out at **Annexe 1** to this document. The OFT is currently of the view that the Revised Commitments address the OFT's competition concerns in this case.

1.10. The OFT invites representations from interested third parties as to the Revised Commitments, by 17 January 2014.

1.11. A decision by the OFT to accept the Revised Commitments would not amount to or imply any finding as to the legality or otherwise of the conduct by the Parties either prior to acceptance of the Revised Commitments or once the Revised Commitments are in place.

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[11] Under the Revised Commitments, EEA residents means a consumer who has an EEA address, an EEA telephone number or an EEA registered credit card. For the avoidance of doubt, the nationality or legal residency or tax status of the individual is irrelevant.

2 INTRODUCTION

2.1. Section 31A of the Act provides that, for the purposes of addressing the competition concerns it has identified, the OFT may accept, from such person or persons concerned as it considers appropriate, commitments to take such action (or refrain from such action) as it considers appropriate.

2.2. Having considered the Parties' proposed Revised Commitments (**Annexe 1**), the OFT is currently of the view that the Revised Commitments address its competition concerns, for the reasons set out in this notice ('Consultation Notice on the Revised Commitments'). On this basis, the OFT is currently of the view that it is appropriate for it to exercise its discretion to close its investigation by way of a formal decision accepting the Revised Commitments.

2.3. Therefore, the OFT hereby gives notice to interested third parties pursuant to paragraph 3 of Schedule 6A of the Act that it proposes to accept the Revised Commitments offered by the Parties in case CE/9320/10 in accordance with section 31A(2) of the Act. The OFT invites representations from interested third parties on this proposed course of action.

2.4. Formal acceptance of the Revised Commitments by the OFT would result in the termination of its investigation, with no decision made on whether or not the Act or Article 101 TFEU has been infringed by any of the Parties. For the avoidance of doubt, a decision by the OFT accepting binding commitments would not include any statement as to the legality or otherwise of the conduct by the Parties under investigation either prior to acceptance of the Revised Commitments or once the Revised Commitments are in place.

2.5. As far as general deterrence is concerned, the OFT provisionally considers that its proposed decision to accept the Revised Commitments would promote competition law compliance in vertical distribution arrangements in the hotel online booking sector. To the extent that this is not the case, the OFT could decide to take further enforcement action in relation to other vertical distribution arrangements and/or related markets which raise competition concerns.

2.6. **Annexes 2 and 3** to this document contain relevant extracts from *OFT1500*[12] and are provided for ease of reference. **Annexe 2** describes the OFT's investigation; the market context in which the investigation has been carried out; and which parties are involved. **Annexe 3** sets out the OFT's competition concerns and summarises the Commitments as set out in the Consultation.

2.7. **Annexe 4** to this document includes an overview of the responses made to the Consultation and a description of how the OFT has taken them into account.

2.8. The remainder of this document sets out a brief summary of the OFT's competition concerns, the Commitments and responses to the Consultation. It then sets out the Amendments to the Commitments and why the OFT is currently minded to accept the Revised Commitments.

2.9. The OFT invites interested third parties to make representations, which it will take into account before making its final decision on whether to accept the Revised Commitments. Details of how to respond to this consultation are provided at the end of this document. The closing date for comment is 17 January 2014.

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[12] OFT's Notice of intention to accept binding commitments to remove certain discounting restrictions for Online Travel Agents and Invitation to comment, issued on 9 August 2013.

3   THE COMMITMENTS AND REVISED COMMITMENTS

OFT's competition concerns

3.1.   The Statement of Objections alleged that Booking.com and Expedia each entered into separate arrangements with IHG and ILPL which restricted each OTA's ability to discount the rate at which Room-Only hotel accommodation bookings are offered to consumers.

3.2.   The OFT's competition concerns are as follows:

- **Current restrictions on discounting limit competition on room rates**: when OTAs face the current restrictions on discounting a hotel's Room-Only accommodation, there is likely to be limited, if any, competition on the offer of room rates between OTAs and between OTAs and the hotel's direct online sales channel for those hotel accommodation bookings (that is, intra-brand competition).

- **Current restrictions on discounting may increase barriers to entry**: the current restrictions on discounting may create barriers to entry to the extent that they prevent new OTAs from entering the market, and/or achieving sufficient scale (with discounted rates for Room-Only hotel accommodation).

- **To the extent that similar discounting restrictions are replicated currently in the market, then any prevention, restriction or distortion of competition is further exacerbated**: although the OFT has not investigated the extent to which similar discounting restrictions are replicated in the market, the OFT understands that the alleged practices are potentially widespread in vertical distribution arrangements in the industry. In principle, a market in which discounting restrictions are prevalent is likely to be characterised by significant limits to price competition and barriers to entry.

Commitments

3.3.   In order to address the competition concerns of the OFT and assist with bringing the investigation to a close, the Parties offered Commitments to the OFT that they would modify their behaviour in accordance with the following key Principles:

- **Hotel room discounts offered by OTAs:** OTAs would be free to offer reductions off headline room rates,[13] for example by way of discounts, vouchers, rewards and/or cash back, funded by their commission revenue or margin to members of a 'closed group', for instance in the context of membership or loyalty schemes.[14] Eligibility for such discounts would be dependent on the end-user making the booking having joined the closed group and having made a single previous booking (which is/has become non-refundable) after the effective date of the Commitments of any hotel room with that OTA.

- **Hotel room discounts offered by hotels:** Hotels would also be free to offer reductions off their own headline rates to closed group members on the same basis as OTAs.

- **Advertising of hotel room discounts:** OTAs would be free to publicise information regarding the availability of discounts in a clear and transparent manner, including to price comparison websites and meta-search sites (that is, to members and non-members). However, OTAs cannot publicise information regarding the specific level or extent of discounts for any IHG hotel room or any other information which would allow a discounted retail rate to be calculated (including, for the avoidance of doubt, the discounted rate itself) to non-members. Similarly, other (non-IHG) hotels may prevent OTAs from publicising such information for their hotel rooms to non-members.

3.4. Other restrictions, such as MFN provisions, have not been considered by the OFT and are not the subject of the Commitments, save to the extent

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[13] Under the Commitments, 'headline room rate' means the room-only headline hotel room rates set by the relevant hotel partner for its rooms. It refers to the published retail rate for a room at a hotel on a particular night at a given point in time.

[14] Joining a closed group is intended to be a relatively low threshold, which may require only the entry of certain personal details online. This means that consumers would not be disincentivised from joining several groups due to onerous joining mechanisms. Depending on the OTA offering the scheme, no purchase may be required to join the closed group itself (as opposed to being eligible for discounts).

that such restrictions could prevent[15] either hotels or OTAs from offering such discounts as are allowed for by the Commitments.[16] This is to ensure the efficacy of the Commitments and avoid the potential for any distortive effects. Thus, under the Commitments the OTA Parties may not prevent hotels from operating on the basis of arrangements which are consistent with the Principles, that is, from offering discounts in an equivalent manner to OTAs.

3.5.   The OFT remains of the view, following the Consultation, that the Principles and related provisions as set out above are appropriate to address its competition concerns.

Responses to the Consultation

3.6.   The OFT conducted the Consultation pursuant to section 31A of the Act to seek views on the Commitments offered by the Parties. This took the form of publication of a Notice to accept binding commitments and invitation to comment issued on 9 August 2013 (*OFT1500*).

3.7.   The Consultation ran for five weeks and closed on 13 September 2013. The OFT received over thirty-five responses from a range of respondents including independent hotels, hotel chains, OTAs, industry associations and other interested third parties.

3.8.   The OFT contacted a wide range of participants in the hotel online booking sector to seek their views. Such potential respondents included hotel chains, OTAs, and industry associations. The OFT also contacted organisations in other markets with experience in areas relevant to the

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[15] This could be indirect, for example if a hotel is required to offer an OTA the same discounted booking rate as the hotel or another OTA is offering to closed group customers.

[16] The adjustment of MFN or equivalent provisions required by the Revised Commitments is a minimum standard only. The Revised Commitments would not affect any existing contractual arrangements under which a hotel can offer discounts, or allow its other OTA partners to do so. For the avoidance of doubt, this would mean, amongst other things, that if discounting by that hotel or discounting by other OTAs of that hotel's accommodation is currently outside the scope of any MFN provisions, this would be unaffected by the Revised Commitments. The Revised Commitments also do not affect the ability of hotels and OTAs to agree additional discounting rights and adjustment of MFN or equivalent provisions that go beyond the Principles set out in the Revised Commitments.

Commitments, such as the use of yield management techniques. The OFT held follow-up calls and meetings with a number of respondents.

3.9.   In addition, the OFT was interested to understand how consumers would perceive the operation of the Commitments in practice, for example, membership of closed groups and the prior booking requirement. Therefore, the OFT engaged a market research agency to conduct consumer focus groups and report on areas of consumer-related interest arising at those consumer focus groups.

3.10.   The respondents to the Consultation made submissions mainly relating to the following:

- **Rate parity/MFN provisions:** The Commitments do not address rate parity and other types of MFN provisions directly. Some respondents urged the OFT to investigate the effect of such provisions. In addition, the OFT received a number of queries with regard to the extent to which the Commitments have an impact on the ability of hotels to offer discounts to closed groups, if there are provisions such as MFNs which may make it difficult for hotels to do so.[17]

- **Potential adverse impact on market structure:** Some respondents submitted that the Commitments may have an adverse impact on the structure of the market by strengthening OTAs' market position vis-à-vis hotels, strengthening Booking.com and Expedia's market positions, and/or impacting on consumers' ability to shop around.

- **Efficiency arguments:** Some respondents supported the efficiency arguments put forward by the Parties[18] while others challenged the strength of the efficiency arguments. The OFT did not receive evidence that either strongly confirmed or refuted the efficiency arguments.

3.11.   **Annexe 4** sets out under these headings the key issues raised in the responses received to the Consultation, alongside limited submissions

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[17] Indirectly, by requiring the hotel to offer an OTA that benefits from an MFN provision the same lower booking rate as the hotel is offering to its customers.

[18] The efficiency arguments put forward by the Parties are set out in section 4 of Annexe 3, which replicates paragraphs 5.23-5.24 of OFT1500 (the Notice to accept binding commitments and invitation to comment issued on 9 August 2003).

made in respect of the geographic scope and duration of the Commitments, together with the OFT's response.

3.12. In summary, the OFT notes that the submissions it received during the Consultation provided contradictory views on a variety of issues, and that little evidence was provided in support of the submissions. The feedback from the Consultation suggested that the Revised Commitments are sufficient to address the issue of restrictions on OTAs' ability to offer discounts, which was the focus of the OFT's investigation, that is, that the Revised Commitments do not need to allow OTAs to engage in full, unrestricted discounting. Based on its assessment of the evidence available, the OFT has sought to strike the right balance in terms of the extent of the intervention needed in this sector to address its competition concerns, as set out in paragraphs 3.31ff below.

The Revised Commitments

3.13. In the light of representations submitted to the OFT pursuant to the Consultation and further developments (including the OFT's further consideration of the sector), the OFT requested from the Parties, and has received, the Revised Commitments.[19] Specifically, the Amendments are as follows:

- **Hotel closed group discounting**: Amendments to clarify that the Commitments envisage hotels being able to offer discounts in an equivalent manner to OTAs.[20] These Amendments have been offered because the OFT received a number of queries about the extent to which the Commitments have an impact on the ability of hotels to offer discounts to closed groups.

- **Geographic scope:** An amendment to the geographic scope of the Commitments to the effect that they would apply to bookings

[19] The Parties have offered the Revised Commitments in the understanding that the OFT will close its investigation in this case without any finding of infringement and the offering of the Revised Commitments by the Parties does not constitute an admission of wrongdoing by the Parties.

[20] However, unlike OTAs, hotels would not fund such discounts using commission revenue or equivalent margin. For further details, see paragraph 3.17.

made by EEA residents for rooms in hotels located in the UK, rather than to bookings made by UK residents for rooms in hotels located in the EU.

- **Duration:** An amendment to specify that the Revised Commitments would remain in force for a period of two years, rather than three years.

Hotel closed group discounting

3.14. Under the Commitments (and the Revised Commitments) the Parties may not prevent hotels from operating on the basis of arrangements which are consistent with the Principles, that is, from offering discounts in an equivalent manner to OTAs.

3.15. However, the Commitments did not specify what type of hotel discounting would be consistent with the Principles. The OFT received a number of queries about the extent to which the Commitments have an impact on hotels' ability to offer discounts. In light of the comments received in the Consultation, the Parties have offered drafting amendments to the Commitments to clarify the position.

3.16. Specifically, the Parties have offered drafting amendments to clarify that OTAs shall not enter into or enforce any MFN or equivalent provisions in respect of reductions off headline room rates offered by hotels to their closed group members. This is subject to the condition that the hotel does not publicise information regarding the specific level of discounts for a particular hotel room to consumers who are not members of that closed group. For example, the hotel would not be able to publish to such consumers the amount/percentage discount offered which would allow a discounted rate to be calculated. This mirrors the restrictions on OTAs' advertising of hotel room discounts set out in the Commitments.

3.17. The Revised Commitments do not envisage any form of financial 'cap' or limitation on the extent of the discounts that hotels could offer to closed group members without MFN or equivalent provisions being enforced against them. This is the only difference between OTA closed group discounting and hotel closed group discounting set out in the Revised Commitments (in particular, the same geographic scope and prior booking requirement apply).

3.18. The provision above relates only to the adjustment of MFN or equivalent provisions to the extent necessary, setting out a minimum standard

required of the OTA parties. In particular, it would be without prejudice to the existing ability of any particular hotel to discount its hotel rooms without triggering the enforcement of an MFN or equivalent provisions by an OTA.[21]

Geographic scope

3.19. The OFT is aware of a significant amount of enforcement activity by other national competition authorities ('NCAs') across the European Competition Network ('ECN') and by competition authorities of the European Free Trade Association ('EFTA') Member States in the hotel online booking sector. It is important that the enforcement efforts of these competition authorities are coordinated where appropriate.

3.20. In the light of the evolving enforcement activities in several countries in the EEA in which the Revised Commitments would operate, the Parties have offered amendments to the geographic scope of the Commitments so that:

a) **all EEA residents**[22] could benefit from the new discounting opportunities provided for by the Revised Commitments, rather than UK residents only. This change is intended to ensure that OTAs and UK hotels enjoy the benefits of the internal market by having the ability to offer discounts both in the UK and elsewhere within the EEA, and

b) the Revised Commitments would apply to bookings made in respect of **hotels located in the UK**, rather than hotels located in the EU. As the Parties have offered to extend the benefits of the Commitments to all EEA residents (rather than UK residents only), the OFT provisionally considers that it is appropriate to limit the geographic scope of the hotels to which the Revised Commitments would apply. The OFT currently considers that other NCAs and competition

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[21] The Revised Commitments also do not affect the ability of hotels and OTAs to agree additional discounting rights and adjustment of MFN or equivalent provisions that go beyond the Principles set out in the Revised Commitments.

[22] That is, a consumer who has an EEA address, an EEA telephone number or an EEA registered credit or debit card; for the avoidance of doubt, the nationality or legal residency or tax status of the individual is irrelevant.

authorities of the EFTA Member States may be best-placed to secure benefits for UK residents booking hotels in their respective jurisdictions, when investigating the contracts between those hotels and OTAs.

3.21.   The OFT intends to continue to cooperate with its counterparts within the ECN and the competition authorities of the EFTA Member States to help secure benefits for UK consumers where restrictions of competition in this sector in other jurisdictions have an impact on them.

Duration

3.22.   The OFT is aware that online travel agency services, including hotel online booking, is a growing sector and is characterised by frequent introduction of new technology or platforms, such as apps (for example, specifically offering discounted accommodation for last-minute bookings),[23] new business models such as the consumer-to-consumer website AirBnB.com,[24] developments such as TripAdvisor offering independent hotels and B&Bs the ability to participate in hotel price comparison on its website,[25] and the expansion of search websites into the travel sector (such as Google and Microsoft entering the meta-search site space).[26]

3.23.   Some respondents to the Consultation urged the OFT to consider the risk that the Commitments could cause distortions. For example, some respondents highlighted a risk that the Commitments could shift consumer purchasing behaviour away from hotels' own booking websites to OTAs, raising hotels' distribution costs.[27]

3.24.   In light of these considerations, the Parties have offered to reduce the duration of the Commitments from three years to two years. The OFT

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[23] See for example http://techcrunch.com/2012/11/07/hotel-tonight-faces-an-attack-of-the-last-minute-hotel-app-clones-in-europe/ and http://blinkbooking.com/en/main/faq .

[24] Web Reservations International/Hostelbookers.com, OFT decision dated 2 August 2013.

[25] www.tripadvisor.co.uk/PressCenter-i6401-c1-Press_Releases.html.

[26] Priceline/Kayak, OFT decision dated 9 May 2013.

[27] For further detail on the responses to the Consultation, see Annexe 4.

has provisionally concluded that a period of two years is appropriate because:

- Although the OFT expects to see invigorated rate competition shortly after the effective date of the Revised Commitments, the OFT considers that a duration of less than two years would not address the OFT's current competition concerns because there would be insufficient time for the full benefits of increased retail rate competition to be realised. On the other hand, the OFT currently considers that a period of longer than two years risks excessive regulatory intervention in a dynamic, innovative sector, and would not allow the OFT to react as quickly to any changes.

- After two years, the Competition and Markets Authority ('CMA') would be able to reassess the position using information provided by the Parties in annual reports following the adoption of the Revised Commitments, to decide if further action in this sector is appropriate.[28]

- If necessary, during the course of the two-year period, under section 31B(4) of the Act, the OFT (or in due course, the CMA) could, where it had reasonable grounds for believing that there has been a material change of circumstances since the Revised Commitments were accepted, continue the investigation, make a decision or give a direction.

Other, minor changes

3.25. In addition to the substantive changes described above (including consequential amendments to the text of the Commitments), a number of minor clarificatory/drafting amendments have been made to the Commitments which were the subject of the Consultation. These do not affect the substance of the Principles set out in the Commitments.

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[28] See paragraph 3.47 with regard to reporting requirements.

Rate parity/retail rate MFN provisions

3.26.   The focus of the OFT's investigation has been the current restrictions on OTAs' discounting off the Room-Only Rate set by a hotel. The OFT has not investigated MFN provisions in this case and has made no assessment of whether MFN provisions may give rise to a breach of the Chapter I prohibition and/or Article 101 TFEU.

3.27.   However, to ensure that the Revised Commitments are effective, the Parties have committed to amend, remove or not include any provisions in current and future commercial arrangements between them that could undermine the new discounting freedoms provided for by the Revised Commitments. This could include amending any MFN provisions, if necessary. The Parties must also use reasonable endeavours to ensure that there are no provisions in their current agreements with other OTAs and hotels which would undermine the new discounting freedoms, and must not include such provisions in any new arrangements. Again, this could include amending any MFN provisions, if necessary. In particular, MFN provisions must not be enforced in respect of either (i) the offering of discounts complying with the Principles to closed group members who have made a prior booking, or (ii) the publication of details of such discounts to members of the closed group.[29]

3.28.   As explained in paragraph 3.16 above, in the Revised Commitments the Parties have also clarified that OTAs shall not enter into or enforce any MFN or equivalent provisions in respect of reductions off headline room rates offered by hotels to their closed group members. This is subject to the condition that the hotel does not publicise information regarding the specific level of discounts for a particular hotel room to consumers who are not members of that closed group.

3.29.   Having regard to the present specific legal and economic context, for the duration of the Revised Commitments (if they are ultimately accepted), as regards the Parties to this investigation, the OFT would be unlikely to investigate under Chapter I of the Act or Article 101 TFEU

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[29] However, the Revised Commitments do not affect the application of MFN provisions against discounts which are published outside of the closed group to which the discount has been offered.

any MFN provisions that comply with the Principles.[30] The same would likely apply to similar MFN provisions, that is, provisions that comply with the Principles, in the Parties' arrangements with other OTAs and hotels, as well as in arrangements between third party hotels and OTAs.

3.30. However, if the Revised Commitments were ultimately accepted and the OFT became aware that provisions, such as MFN provisions, appeared in practice to undermine the Principles, it would be open to the OFT to consider taking further action. In particular, the OFT would consider its options carefully if it became aware that MFN provisions were being enforced against hotels in a way that would make it practically impossible or very difficult for hotels to allow their OTA partners to offer closed group discounts or to offer discounts themselves to their own closed groups. It would also be open to the OFT/CMA to investigate MFN provisions in other sectors should the OFT/CMA have reasonable grounds for suspecting that such clauses, in their specific context, infringe UK or EU competition law.

The OFT's provisional assessment of the Revised Commitments

3.31. As explained in paragraph 3.2 above, the OFT's competition concerns set out in the Statement of Objections relate to current restrictions on OTA discounting which limit competition on room rates and may increase barriers to entry.

3.32. In terms of the impact on intra-brand competition,[31] the Revised Commitments offered by the Parties allow for greater discounting freedom, albeit with some residual restrictions. Therefore, the Revised Commitments allow greater price competition, between (i) OTAs and hotels' direct online booking channels; and (ii) OTAs, where, in the OFT's provisional view, it is currently likely to be significantly restricted.

3.33. Consumers would have the option of joining numerous closed groups without needing to make a purchase first (as the prior booking requirement relates to eligibility for discounts, not the ability to join a

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[30] The OFT notes that as of 1 April 2014 the OFT will cease to exist and the CMA will then assume the OFT's current competition enforcement powers. The OFT cannot bind the CMA in how it chooses to exercise its enforcement powers from 1 April 2014.

[31] See paragraph 3.2, first bullet, above.

closed group). As set out in paragraph 33 of Annexe 4, the OFT currently expects that, once OTAs obtain the discounting freedom envisaged by the Revised Commitments, they would need to offer competitive discounts to 'multi-homing'[32] customers to discourage them from purchasing through a rival OTA whose closed group the customer has already joined. All closed group members would benefit from this price competition, whether or not they have joined a rival OTA's closed group. The OFT therefore currently expects that under the Revised Commitments consumers would gain significant benefits from the ability of OTAs to offer discounts to closed group members, and the Revised Commitments therefore address its competition concern in relation to intra-brand competition.

3.34. In relation to the impact on barriers to entry,[33] under the Revised Commitments, OTAs would be able to offer discounts to end-users who have joined a closed group and made a single booking, where they are currently prevented from doing so. As set out in paragraphs 27-37 of Annexe 4, the OFT therefore provisionally considers that the Revised Commitments would increase incentives for new entry and lower barriers to entry created by the current restrictions on discounting.

3.35. The OFT's concern is that, currently, a new entrant may not be able to offer discounts to attract customers away from incumbents. In particular, a more efficient new entrant may not be able to use its lower costs to offer larger discounts in order to attract customers away from incumbents.

3.36. Under the Revised Commitments, new entrants would still be prevented from offering a discount on an initial purchase. However, they would be able to compete by offering discounts on future purchases. This may substantially reduce barriers to entry relative to the current market conditions as it would provide entrants with additional scope to compete. Such competition could take place through the ability to offer discounting schemes and to advertise the existence of these schemes to non-members. This should provide consumers with a valuable incentive to search across OTAs for the best available deals and to become

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[32] That is, customers who join more than one closed group.

[33] See paragraph 3.2, second bullet, above.

members of more than one closed group to find out details of specific discounts on offer to eligible members.[34]

3.37. The OFT has received submissions, as set out in paragraphs 16-17 of Annexe 4, suggesting that closed group discounting and/or the prior booking requirement might result in a switching cost for customers or raise barriers to entry. However, the OFT's view is that the switching cost arising from the closed group and prior booking requirements would not undermine the ability for greater price competition to emerge in this market, for the reasons set out in paragraph 32 of Annexe 4.

3.38. In addition, the Revised Commitments envisage a cap on OTA discounting up to the level of the OTA's commission revenue or margins. The OFT currently considers that such a cap might serve to protect new entrant OTAs from an aggressive response (for example, retaliatory deep-discounting) by incumbent OTAs that might otherwise deter entry.

3.39. The OFT provisionally considers that the Revised Commitments should allow, and set appropriate incentives for, greater price competition between OTAs and between OTAs and hotels. The OFT would expect to see OTAs and hotels compete to attract customers through the attractiveness of their closed group offering, and that consumers will ultimately benefit from such competition, alongside competition on price, quality, range and service and other factors.

3.40. Therefore, while the Revised Commitments would not allow for unrestricted discounting, the OFT would expect them to result in greater price competition, where there may currently be none or it may be significantly restricted, as well as lowering barriers to entry by allowing OTAs to offer certain discounts to attract customers. The OFT therefore expects the Revised Commitments to introduce further competition between OTAs, and between OTAs and hotels' direct online sales channels, while also encouraging new entry of OTAs.

3.41. The OFT has considered the issue of how much discounting freedom would be appropriate in the context of the dynamic nature of the market in the UK. As described in paragraph 3.22 above, the OFT is aware that

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[34] As noted above, consumers would have the option of joining numerous closed groups without needing to make a purchase first.

online travel agency services, including hotel online booking, is a growing sector and is characterised by frequent introduction of new technology or platforms and development of new business models. The OFT recognises that there is a complex interaction between various players and distribution channels. In this context, freedom by OTAs to discount hotel accommodation without any restrictions may potentially have harmful effects by reducing the incentives of hotels to deal with OTAs (or to limit the number of OTAs that they deal with), thereby potentially damaging inter-brand competition, and by chilling innovation in the development of new business models.

3.42. Risks could also be created by requiring a greater degree of price freedom than provided for by the Revised Commitments because such freedom might jeopardise the possible realisation of efficiencies put forward by the Parties. These are that (1) the benefits to a hotel flowing from yield management (and consequent consumer benefits) might be made significantly more difficult or impossible to achieve were all restrictions on discounting to be removed; and/or that (2) a greater degree of pricing freedom could also result in a shift in the balance of power between hotels and their OTA partners, leading to the cannibalisation of their direct sales channel and potentially raising their distribution costs. The OFT also notes the submissions by the OTA parties that requiring a greater degree of pricing freedom may mean that OTAs' incentives to invest, for example in pre-sales services and other promotional activities (including the functionality of their websites, range of travel offers, customer support, or content quality), may be undermined if other OTAs (or hotels) are able to undercut their prices by publishing a lower headline rate, given low search costs of customers for hotel online booking services.[35]

3.43. As set out above and in paragraph 44 of Annexe 4, the OFT did not receive evidence that either strongly confirmed or refuted the efficiency

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[35] It is not necessary for the OFT when exercising its discretion under section 31A (2) of the Act to carry out an assessment under Article 101(3)/section 9 of the Act to establish whether the residual restrictions remaining under the Revised Commitments meet all of the relevant criteria under that Article and section. The OFT's acceptance of the Revised Commitments should not be seen as amounting to or implying any finding as to the legality or otherwise of the conduct of the Parties either prior to acceptance of the Revised Commitments or once the Revised Commitments are in place.

arguments put forward by the parties to justify the residual restrictions remaining under the Revised Commitments. However, the responses to the Consultation and further representations from the Parties suggest that, in the specific factual context, the arguments put forward for the existence of efficiencies are likely to have some merit in this sector.

3.44. The OFT has also considered the potential risk of harmful effects in the light of the scope of its investigation, which was limited to two large online travel agents and one large hotel chain, whereas the Revised Commitments are intended to introduce further competition between parties in the wider market. In particular, the OFT has not been able to consider in detail the ways in which the relationships of small hotel groups and independent hotels with OTAs may differ from those of large hotel chains, or for whom the potential efficiencies from having control of the headline rate may be more important. This may mean that the potential impact on hotel incentives to use different distribution channels, and the possible resulting impact on inter-brand competition, may vary.

3.45. The OFT recognises that the exact consequences of the introduction of limited price competition through the Revised Commitments if they are accepted cannot be anticipated with complete certainty. For example, as referred to above and set out in paragraphs 10-18 of Annexe 4, the OFT has received submissions suggesting that the Commitments might increase switching costs, resulting in an incumbency advantage and that, if they result in a cannibalisation of the direct channel, this may raise hotels' distribution costs. However, for the reasons set out in paragraphs 27-37 of Annexe 4, on balance, the OFT's current assessment is that the benefits to competition from allowing closed group discounting under the Revised Commitments would be likely to outweigh the potential risk from increasing any switching costs, relative to the current market position. Indeed, while it might be easy for consumers to switch between OTAs currently, there are limited benefits from doing so in respect of Room-Only hotel accommodation due to the current restrictions on discounting. By contrast, the OFT currently considers that the switching cost under the Revised Commitments would be small in comparison with future benefits (that is, long-term eligibility for discounts).

3.46. Further, the OFT currently considers that the clarifications to the Commitments following the Consultation, and the residual restrictions

on OTA discounting which would remain under the Revised Commitments, would mitigate the risk of such unintended consequences. In particular, the reduction of the duration of the Commitments from three to two years means that the OFT/CMA would be able to consider the impact of the Revised Commitments in this evolving sector, and any unintended consequences, within a shorter time horizon.

3.47. In addition, to monitor the effectiveness of the Revised Commitments, the Parties would be required to report to the OFT/CMA each year on the implementation of the Revised Commitments. The Revised Commitments also contain provisions relating to compliance, according to which the Parties and other hotels and OTAs could write to the OFT/CMA regarding alleged non-compliance by Expedia, Booking.com and/or IHG with the Revised Commitments. The Parties could also write to the OFT/CMA regarding contractual arrangements of other hotels and/or OTAs which may be incompatible with the Principles.

3.48. As noted above, under section 31B(4) of the Act, the OFT (or in due course, the CMA) could continue the investigation, make a decision or give a direction where it had reasonable grounds for believing that there has been a material change of circumstances since the Revised Commitments were accepted.[36]

Conclusion

3.49. Accordingly, in light of the considerations set out above, based on an assessment of the evidence available to it, the OFT currently considers that the Revised Commitments address its competition concerns by allowing for a greater degree of price competition than currently exists, and by lowering barriers to entry by enabling new entrants to compete to attract customers to join their closed groups through the ability to offer discounts. The OFT is provisionally satisfied that the Principles are sufficient and appropriate to address its competition concerns in the context of the affected markets.

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[36] The OFT/CMA could also take such action where it had reasonable grounds for suspecting that a person has failed to adhere to one or more of the terms of the Revised Commitments; or it had reasonable grounds for suspecting that information which led it to accept the Revised Commitments was incomplete, false or misleading in a material particular.

3.50. For the avoidance of doubt, the Revised Commitments would not in any way restrict OTAs' ability to agree with IHG and/or any other hotel any other discounting rights over and above the right to offer Reductions within the meaning of the Revised Commitments, subject to existing contractual restrictions. Similarly, the adjustment of MFN or equivalent provisions required by the Revised Commitments is a minimum standard only. The Revised Commitments would not affect any existing contractual arrangements under which a hotel can offer discounts, or allow its other OTA partners to do so.[37]

3.51. The Revised Commitments would also not in any way restrict the ability of hotels to set the headline room rates for their respective hotel rooms, or benefits available to members of OTAs' and hotels' existing loyalty schemes prior to the Revised Commitments being accepted by the OFT (should the OFT ultimately proceed to accept them).

3.52. In addition, the Revised Commitments only relate to discounts from the headline room rate and do not relate to or affect an OTA's ability to offer additional services or goods alongside hotel accommodation bookings, subject to existing contractual restrictions.

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[37] For the avoidance of doubt, this would mean, amongst other things, that if discounting by that hotel or discounting by other OTAs of that hotel's accommodation is currently outside the scope of any MFN provisions, this would be unaffected by the Revised Commitments. The Revised Commitments also do not affect the ability of hotels and OTAs to agree more extensive adjustment of MFN provisions than is required by the Revised Commitments.

4 THE OFT'S PROPOSED NEXT STEPS

4.1. In light of the above, the OFT provisionally considers that the Revised Commitments as set out in Annexe 1 of this document address its competition concerns in this case. Therefore, the OFT intends to accept the Revised Commitments by means of a formal commitments decision.

Invitation to comment

4.2. As required by paragraph 3 of Schedule 6A of the Act, the OFT now invites interested third parties to make representations on the Revised Commitments. The OFT will take such representations into account before making its final decision whether to accept the Revised Commitments.

4.3. The OFT will also inform the European Commission, no later than 30 days before the adoption of a decision accepting commitments.[38]

4.4. Any person wishing to comment on the Revised Commitments should submit written representations to the OFT at the address given below, by 17 January 2014. We would be grateful if responses can be supplied in both hard copy and in electronic form. Please quote the case reference CE/9320/10 in all correspondence related to this matter.

Hotel Online Booking Team (SIP)
Office of Fair Trading
Fleetbank House
2-6 Salisbury Square
London EC4Y 8JX

Email: hotelonlinebooking@oft.gsi.gov.uk

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[38] In accordance with the requirement under Article 11(4) of Regulation 1/2003 Council Regulation (EC) No 1/2003 of 16 December 2002 on the implementation of the rules on competition laid down in Articles 81 and 82 of the Treaty (OJ L1, 4.1.03, p1) to inform the European Commission no later than 30 days before the adoption of a decision accepting commitments in all cases which affect trade between Member States, to enable it to submit any comments.

Exhibit 2.

Case No COMP/M.6163 - AXA/ PERMIRA/ OPODO/ GO VOYAGES/ EDREAMS

Only the English text is available and authentic.

REGULATION (EC) No 139/2004 MERGER PROCEDURE

Article 6(1)(b) NON-OPPOSITION
Date: 30/05/2011

In electronic form on the EUR-Lex website under document number 32011M6163

EUROPEAN COMMISSION

Brussels, 30.5.2011

C(2011) 3913 final

PUBLIC VERSION

MERGER PROCEDURE

To the notifying parties:

Dear Sir/Madam,

Subject: **Case No COMP/M.6163 - AXA/ PERMIRA/ OPODO/ GO VOYAGES/ EDREAMS**
Commission decision pursuant to Article 6(1)(b) of Council Regulation No 139/2004[1]

1. On 19 April 2011, the European Commission received a notification of a proposed concentration pursuant to Article 4 of the Merger Regulation by which the undertakings AXA Investment Managers Private Equity Europe ('AXA PE', France) belonging to the French AXA group and Permira Holdings Limited ('Permira', Guernsey), acquire within the meaning of Article 3(1)(b) of the Merger Regulation joint control of Opodo Limited ('Opodo', United Kingdom), the GO Voyages group ('GO Voyages', France) and the eDreams group ('eDreams', Spain) by way of purchase of shares[2].

I. THE PARTIES

2. **AXA PE** is a private equity firm belonging to the French AXA Group, controlling *inter alia* GO Voyages.

3. **Permira** is a private equity firm controlling *inter alia* eDreams.

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[1] OJ L 24, 29.1.2004, p. 1 ("the Merger Regulation"). With effect from 1 December 2009, the Treaty on the Functioning of the European Union ("TFEU") has introduced certain changes, such as the replacement of "Community" by "Union" and "common market" by "internal market". The terminology of the TFEU will be used throughout this decision.

[2] Publication in the Official Journal of the European Union No C 129, 30.04.2011, p.6

4. **Opodo** is an online travel agent ("OTA") which is currently owned by the travel technology company Amadeus IT Group ("Amadeus").[3] It operates through websites in Austria, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Norway, Poland, Portugal, Spain, Sweden, Switzerland and the United Kingdom.

5. **eDreams** is an OTA which mainly operates through websites in France, Germany, Italy, Portugal, Spain, the United Kingdom and also achieves non significant sales outside the EEA.

6. **GO Voyages** is an OTA offering its services mainly in Austria, Belgium, France, Germany, Italy, The Netherlands, Portugal, Spain, the United Kingdom and achieving non significant sales outside the EEA.

II. THE OPERATION AND THE CONCENTRATION

7. The proposed operation consists in the acquisition within the meaning of Article 3(1)(b) of the Merger Regulation by AXA PE and Permira of joint control over Opodo, GO Voyages and eDreams. All three acquisitions described above will happen simultaneously and will be followed by certain intra group transfers in order to integrate Opodo, GO Voyages and eDreams into one single group (the "Integrated Group") under the roof of a holding company.

Joint control

8. AXA PE and Permira will enter into a shareholders' agreement in relation to the Integrated Group which will reflect *inter alia* the following principles:

9. AXA PE and Permira will have equal voting rights in respect of the Integrated Group.[4] They will have an equal right to appoint and be represented in the management bodies of the various entities of the Integrated Group.[5] All decisions of the supervisory board of the top-holding company of the Integrated Group will require unanimity of the AXA PE and Permira representatives. Furthermore, each of AXA PE and Permira will hold certain veto rights over strategic decisions such as the approval and modification of the annual budget.

10. Therefore it is concluded that AXA PE and Permira will exercise joint control over Opodo, GO Voyages and eDreams within the meaning of Article 3(1)(b) of the Merger Regulation.

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3   Amadeus operates the Amadeus Global Travel Distribution System ("GDS").

4   In particular, at the highest level of the Integrated Group (i.e. at the level of the top-holding company), all decisions of the general meeting of shareholders shall require the unanimous consent of AXA PE and Permira and this despite the fact that AXA PE will indirectly only hold [...]% of the shares and Permira the remaining [...]%.

5   The supervisory board of the top-holding company of the Integrated Group will be composed of an equal number of AXA PE representatives and Permira representatives. The members of the supervisory board as well as the general managers that will manage the company under the supervision of the supervisory board will be appointed unanimously by AXA PE and Permira. The same principles will apply to the composition of the management bodies of the other companies of the Integrated Group (i.e. the Go Voyages, eDreams and Opodo entities).

Single concentration

11. The proposed transaction is composed of several legal transactions corresponding to the acquisition of joint control by AXA PE and Permira over *(i)* Opodo, *(ii)* GO Voyages and *(iii)* eDreams.

12. All three transactions have to be considered as unitary in nature since the economic aim of AXA PE and Permira is to combine each of Opodo, GO Voyages and eDreams into one single integrated group in order to achieve a pan-European reach that could not be obtained by realising only one of the steps of the proposed transaction.

13. Also, the financing structure of the proposed transaction is based on the three-way integration of Opodo with eDreams and GO Voyages. In this respect, the parties explain that the financing structure to acquire Opodo is built on the carrying out of the GO Voyages and eDreams transactions. Conversely, if the Opodo acquisition could not be carried out, any integration of eDreams and GO Voyages would require negotiating a wholly new refinancing package with the banks and Permira and AXA PE agreeing on the structure to implement such a business combination.[6]

14. Furthermore, the share purchase agreement governing the Opodo acquisition and the investment agreement governing mainly the eDreams and GO Voyages acquisitions were negotiated in parallel and are drafted in such way that they are interlinked in the meaning of paragraph 36 et seq. of the Commission Consolidated Jurisdictional Notice.[7] The eDreams and GO Voyages acquisition are governed by one single agreement, the investment agreement. The acquisition of Opodo, governed by a share purchase agreement, will automatically entail the transfer of both eDreams and GO Voyages and the eDreams and GO Voyages acquisitions are necessary to complete the Opodo acquisition. The share purchase agreement in relation to the Opodo acquisition is only conditional on the Amadeus board approval (obtained on 24 February 2011) and on the obtaining of the necessary competition clearances. Therefore – subject to competition clearance – the Opodo transaction will materialise, and as a result also the eDreams and GO Voyages transactions. In addition, all three transactions will occur simultaneously.

15. Therefore it is concluded that the three transactions stand and fall together and constitute a single concentration within the meaning of Article 3(1)(b) of the Merger Regulation.

III. EU DIMENSION

16. The undertakings concerned have a combined aggregate world-wide turnover of more than EUR 5 000 million[8] (AXA: EUR 90 124 million; Permira: EUR […] million, Opodo: EUR […] million). At least two of the undertakings concerned have a EU-wide turnover in excess of EUR 250 million (AXA: EUR […] million; Permira: EUR […] million), and none of the undertakings concerned achieves more than two-thirds of their aggregate EU-

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6   By way of example, the credit facilities to be put in place to finance the Opodo acquisition provide as a condition precedent that evidence must be provided that the reorganisation of the GO Voyages group, the eDreams group and the Opodo group has been effected.

7   OJ C95, 16.04.2008, p.1.

8   Turnover calculated in accordance with Article 5 of the Merger Regulation.

wide turnover within one and the same Member State. The notified operation therefore has an EU dimension pursuant to Article 1(2) of the Merger Regulation.

IV. COMPETITIVE ASSESSMENT

17. The proposed transaction concerns the market for the distribution of travel services. Opodo, GO Voyages and eDreams are all predominantly active in the online distribution of leisure flights.

1. **Market definition**

Product market

18. In previous decisions, the Commission considered that there is a separate market for the distribution of travel services.[9] The Commission has further subdivided this market on the basis of the customer-type, distinguishing between the distribution of business travel and leisure travel services[10].

19. In its past decisions, the Commission has left open whether the market for the distribution of leisure travel services via brick-and-mortar travel agencies and the market for the distribution of leisure travel services via agencies active online were distinct markets or were part of the same market.[11]

20. As regards a possible further distinction by type of product the Commission has in past decisions made a distinction between markets for the distribution of package holidays and markets for the distribution of independent holidays (where the consumer purchases the various elements individually).[12] The Commission noted in a recent decision[13] that based on the available evidence it could not be excluded that the distribution of package holidays would constitute a separate market from the market for the distribution of independent holidays (e.g. flights, hotels, car rental, etc.).

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[9]   Travel agents are retailers distributing various travel services to consumers and business travellers such as flights, car rental and hotel booking.

[10]   Business travel agency services meet the needs of companies for business travel of management and employees in accordance with corporate travel budgets and plans. Leisure travel agencies provide services to individuals in connection with their non-business vacation and personal travel needs. In several cases the Commission considered different product markets for the distribution of leisure travel services and business travel services. See case COMP/M.2627 Otto Versand/Sabre/Travelocity JV, para 12; case COMP/M.2197 Hilton/Accor/Forte/Travel Services JV, para 14. In both cases the precise market definition was left open.

[11]   See case COMP/M.1812 Telefonica/Terra/Amadeus, para 10; case COMP/M.2794 Amadeus/GGL/JV, para 10; case COMP/M.4600 TUI/First Choice, para 41 and following and case COMP/M.4601 KarstadtQuelle/MyTravel, para 31 and following. See also case COMP/M.5996 Thomas Cook / Travel Business of Co-operative Group / Travel Business of Midlands Co-operative Society, para 28 where the Commission indicated that online distribution and distribution via bricks-and-mortar travel agencies may constitute separate markets.

[12]   Case COMP/M.1524 Airtours/First Choice, para 29 and following; case COMP/M.4601 KarstadtQuelle/My Travel, para 30 and following.

[13]   COMP/M.5996 Thomas Cook / Travel Business of Co-operative Group / Travel Business of Midlands Co-operative Society, para 20.

21. The parties submit that the relevant product market is the leisure travel agency services market and that this market cannot be further segmented according to online and offline activities or by type of product.

22. The parties provide several arguments why in their view Opodo, eDreams and GO Voyages compete on the overall market for leisure travel agency services that includes offline channels (high-street travel agency outlets and offline direct sales by airlines), call centres and online channels (travel agency websites, OTA websites and airlines direct websites). In particular, they argue that customers purchase through any of these sales channels exactly the same end-product and benefit from the same guarantees and protective regulations. Further, they refer to an industry report[14] which shows that a significant number of customers shop both online and offline through high-street travel agencies for booking their leisure trip.

23. The market investigation showed mixed views with regard to the question whether distribution of leisure travel services through traditional high-street travel agencies and through online channels are part of the same market. On the one hand, some respondents argued that high-street travel agents and online travel agents distribute the same products and that from their experience, customers starting their shopping process on an OTA website may end up booking via a high-street agency. On the other hand, respondents that were of the opinion that online distribution may constitute a distinct market indicated that there are differences between the products sold (e.g. for some more complex products like cruises or high value packages more services are needed than for other products like flights only). Furthermore, high-street travel agents and OTAs would have different types of customers. Online customers would not enter a high-street travel agency if they could not find a suitable travel product on a particular website, but rather would look on other OTA websites. It was also indicated that the competitive pressure exerted by high-street travel agencies on online travel agencies is weaker than vice-versa. Given these results of the market investigation, it cannot be excluded that the online distribution of leisure travel services may constitute a separate product market within the overall market of the distribution of leisure travel services. However, for the purpose of the present decision, it can be left open whether the online distribution of leisure travel services constitutes a distinct product market as the proposed transaction would not give rise to competition concerns irrespective of the precise market definition.

24. Within the possible market for the online distribution of leisure travel services the online distribution of leisure flights may constitute a separate market. In this regard, the market investigation also showed mixed views. On the one hand, respondents indicated that the sale of flights has the highest online penetration of all leisure travel products. Furthermore, since flights are a rather standardised and thus simple product, the online flight market is more developed than the online activities for other leisure products. On the other hand, arguing against the existence of a separate market, respondents explained that many customers starting their shopping process online finally book via a high-street agency or a call centre. Furthermore, the fact that OTAs operate call centres to provide offline support and that many high-street travel agents are establishing online sales points would indicate that no separation between online and offline distribution of flights should be made. On this basis, it cannot be excluded that the online distribution of leisure flights may constitute a separate market within the possible overall market for

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14   PhoCus Wright's European Travel Report 2010.

the online distribution of leisure travel services. However, for the purpose of the present decision, it can be left open whether the online distribution of leisure flights constitutes a distinct product market as the proposed transaction would not give rise to competition concerns irrespective of the precise market definition.

25. The market investigation broadly confirmed that the online distribution of flights through OTAs and through airline websites are part of the same market. Some respondents to the market investigation pointed to the existence of differences between OTAs and airline websites, in particular, the possibility on OTA websites to compare and to combine flights from different airlines. However, several respondents indicated that OTA websites and airline websites are to be considered as simply different distribution channels offering the same flight products and targeting the same customers. Online customers would look for the best available deals across all channels, including OTA websites, metasearch engines[15] and airline websites.

26. In this regard, the parties indicate that no distinction can be made between sales by OTAs and sales through airline websites. The parties refer to court rulings on cases of unfair competition issues between OTAs and airlines. In these rulings several courts in Member States have accepted that OTAs and airline websites compete.[16] Consumers would also often use OTA websites to search for flights and than book their flight directly at the airline website.

27. Indeed, according to an industry report around 60% of consumers[17] consult search engines when they compare and choose their leisure travel product. Furthermore, search and metasearch engines display OTAs and airline websites indistinguishably. In addition, only 39% of the consumers who use OTA websites to compare leisure travel products, stay on that OTA website to make their booking and 20% of the consumers go to other websites, for example airline websites.[18] Based on these elements it can be concluded that airline websites and OTA websites compete on the same market for the online distribution of flights.

28. By way of conclusion, it follows from the market investigation that the distribution of leisure travel services through online channels might constitute a separate market. Within the possible market for the online distribution of leisure travel services, a possible sub-market for the online distribution of leisure flights might exist. Based on the results of the market investigation, for the purposes of the present case, it can be

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15   Specialised search engines (such as Kayak, Easyvoyage, Bing Travel, Skyscanner, Alibabuy, Easyvols) which allow customers to compare specific flight routes across OTAs and airline websites and rank them by price.

16   Ryanair/eDreams, Commercial Court of Barcelona (Juzgado de la Mercantil), 11 February 2009, confirmed by Appellate Court (Audiencia Provincial), 17 December 2009; eDreams/Ryanair, Commercial Court of Barcelona, 22 December 2010; Ryanair/Vivancances, Tribunal de Commerce de Paris, 6 February 2008; Cheaptickets/Ryanair, Court of Appeal Frankfurt, 5 March 2009; Ryanair/Atrapalo, Commercial Court of Barcelona, 20 January 2009.

17   PhoCus Whright's European Consumer Travel report 2010, p.46, explains that 59% of French consumers, 63% of German consumers and 61% of UK consumers consult search engines when they compare and choose their leisure travel product.

18   PhoCus Whright's European Consumer Travel report 2010, p. 59.

concluded that such a market for the online distribution of flights encompasses the distribution of flights both through OTA websites and through airline websites.

Geographic market

29. The geographic market for the distribution of leisure travel services has been considered national in scope in past Commission decisions[19], amongst others due to language barriers.

30. The parties submit that the relevant geographic market for (any potential segment of) this market is national.

31. The market investigation broadly confirmed that the geographic market for the distribution of leisure travel services is to be considered as national. However, in particular with regard to the online distribution of flights some of the respondents were of the opinion that the geographic market could be larger than national.

32. For the purpose of the present decision, the exact geographic market definition can be left open as the proposed transaction would not give rise to competition concerns irrespective of the precise market definition.

2.   **Competition Assessment**

33. Opodo, eDreams and GO Voyages are all three OTAs that offer travel services including flights, train tickets, hotel and other accommodation booking, car rental, package holidays (traditional and independent packages) and other travel related services.

34. With the exception of Opodo's subsidiary Travellink[20], the parties do not provide business travel services and are only active as leisure travel agencies. While it cannot be excluded that also business customers book their flight ticket or hotel, for example, through the parties' websites, it is not necessary for the case at hand to further analyse the link between business and leisure travel. Indeed, as Opodo's subsidiary Travellink is only active in Scandinavia where eDreams and GO Voyages do not offer their services, no overlap is created in those countries.

35. The parties' activities have a clear focus on the distribution of leisure flights. Flights represented [80-90]% of Opodo's, [90-100]% of GO Voyages' and [80-90]% of eDreams' total gross bookings in 2010.[21]

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19   Case COMP/M.4601 – Karstadtquelle / Mytravel, para 38; case COMP/M.4600 – Tui / First Choice, para. 51; case COMP/M.4234 – Carlson / One Equity Partners / Carlson Wagonlit, para.20. In case COMP/M.5996 – Thomas Cook / Travel Business of Co-operative Group / Travel Business of Midlands Cooperative society, the Commission considered that the possible market for the distribution of holidays via high street travel agencies would not be broader than national in scope.

20   Travellink's revenues in Sweden, Denmark, Norway and Finland amounted in 2010 to EUR [...] million.

21   Hotel bookings represented [0-5]% of Opodo's, [0-5]% of GO Voyages' and [0-5]% of eDreams' total gross bookings in 2010. Car rentals represented [0-5]% of Opodo's, [0-5]% of GO Voyages' and [0-5]% of eDreams' total gross bookings in 2010. The remainder are package holidays and other travel services.

36. Opodo, eDreams and GO Voyages' activities overlap in France, Germany, Italy, Spain and the UK and to a limited extent in Portugal.[22]

37. On a possible overall market for the distribution of leisure travel services (i.e. including online agencies and high-street agencies) the parties have in all six Member States where they overlap (France, Germany, Italy, Spain, the UK and Portugal) very low combined market shares (below [0-5]%). Also on possible sub-segments of this market according to product type, i.e. independent holidays (flights, hotel, etc.), package holidays and leisure flights, the parties' market shares would remain low (reaching a maximum of [5-10]% in the distribution of leisure flights in Italy).

38. On a possible market for the online distribution of leisure travel services (i.e. excluding high-street agencies), the parties achieve higher combined market shares. However, the combined market shares remain below [10-20] % in all six Member States.

39. Even on the possible sub-segments of this online market according to product type, i.e. the markets for the online distribution of independent holidays and of package holidays, the combined market share would remain below [5-10]% and [10-20]%, respectively.

40. On a possible market for the online distribution of leisure flights, the combined market shares in Germany, the UK, Spain and Portugal would remain below [10-20]% (with a maximum of [10-20]% in Spain).

41. In France, according to estimates made by the parties[23], the parties' combined market share on the market for the online distribution of leisure flights amounts to [10-20]% (Opodo [5-10]%, GO Voyages [5-10]%, eDreams [0-5]%). Competitors are Air France ([30-40]%), Expedia ([5-10]%), eBookers ([0-5]%) Travelocity/Lastminute ([0-5]%), others including Low-Cost-Carriers ([40-50]%). Since the market investigation shed some doubt about the market data estimated by the parties, the Commission did its own worst-case analysis in which the market size was re-calculated by excluding the online bookings of traditional high street travel agents. The table below shows market shares for France both on the basis of the parties' estimates and the Commission's re-calculation.

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22   The activities of the parties in Portugal are marginal (below EUR [...]). Opodo has a portal website in Austria and Belgium which redirect clients respectively to the German and French websites and which represent less than EUR [...] in revenues. The combined market shares in these countries would remain below 15% regardless of the product market definition.

23   It is important to note that no industry study is available that estimates, the total market size for the online distribution of leisure flights. While there is some data for the airlines own websites, the activities of OTAs had to be estimated on the basis of MIDT booking data. MIDT does not distinguish between online booking and bookings via high-street outlets. Thus, the parties made some own calculations for the online bookings of traditional high street travel agents (for example, in France Nouvelle Frontieres or Havas/CWT).

France	Market share (Parties)	Market share (Commission)
Opodo	[5-10]%	[5-10]%
GO Voyages	[5-10]%	[5-10]%
Edreams	[0-5]%	[0-5]%
Combined market share	*[10-20]%*	*[10-20]%*
Air France	[30-40]%	[30-40]%
Expedia	[5-10]%	[5-10]%
eBookers	[0-5]%	[0-5]%
Travelocity/Lastminute	[0-5]%	[0-5]%
Others (including Low Cost Carriers)	[40-50]%	[30-40]%
Total market size	*100% (EUR […] billion)*	*100% (EUR […] billion)*

42. Currently eDreams, which entered the French market in 2009, still has a limited market share. Opodo and GO Voyages have comparable market shares of both less than [10-20]%. In France, the combined market share of the parties would be, according to the Commission's own calculations, in any event less than 25% and the parties will continue to face strong competition from airlines and other OTAs such as Expedia.

43. In Italy, according to estimates made by the parties, the parties' combined market share on the market for the online distribution of leisure flights amounts to [10-20]% (Opodo [0-5]%, GO Voyages [0-5]%, eDreams [10-20]%). Competitors are Alitalia ([10-20]%), Windjet ([10-20]%), Expedia ([10-20]%), Volagratis ([5-10]%), Bluexpress ([5-10]%), Air Italy ([5-10]%), Lastminute ([0-5]%), Meridiana ([0-5]%), others ([10-20]%). As already mentioned above, since the market investigation shed some doubt about the market data estimated by the parties, the Commission did its own worst-case analysis in which the market size was re-calculated by excluding the online bookings of traditional high street travel agents. The table below shows market shares for Italy both on the basis of the parties' estimates and the Commission's re-calculation.

Italy	Market share (Parties)	Market share (Commission)
Opodo	[0-5]%	[0-5]%
GO Voyages	[0-5]%	[0-5]%
Edreams	[10-20]%	[10-20]%
Combined market share	*[10-20]%*	*[10-20]%*
Alitalia	[10-20]%	[20-30]%
Windjet	[10-20]%	[10-20]%
Expedia	[10-20]%	[10-20]%
Volagratis	[5-10]%	[5-10]%
Bluexpress	[5-10]%	[5-10]%
Air Italy	[5-10]%	[5-10]%
Lastminute	[0-5]%	[0-5]%
Meridiana	[0-5]%	[0-5]%
Others	[10-20]%	[5-10]%
Total market size	*100% (EUR […] billion)*	*100% (EUR […] billion)*

44. In Italy, only eDreams is a strong player while Opodo and GO Voyages have a very limited presence in the market. Therefore, the increment of the market shares due to the proposed transaction will be small. In Italy, the combined market share of the parties would be, according to the Commission's own calculations, in any event less than 25% and the parties will continue to face strong competition from airlines and other OTAs such as Expedia.

45. It is important to note that investment costs for entering the market for online distribution of flights are limited. They mainly concern creating a national (language) website and call centre where the national language is spoken, obtaining a booking engine (either off the shelf or via a white label agreement with an existing OTA) and marketing activities. Since all steps including the payment and issuing of tickets can be carried out electronically, no substantial local physical presence is required. Potential entrants include OTAs operating in other countries, OTAs which currently mainly focus on hotels, rail or other services or other online retailers. As an example of a recent successful entry, the parties refer to the entrance of eDreams in the French market in 2009.

46. With regard to the effect of the transaction on airline companies – suppliers of the flights and source of commission revenue for OTAs – some respondents to the market investigation indicate that after the merger the parties would be in a very strong negotiating position and could thus exercise market power towards airline companies resulting in higher commissions. However, it is important to note that (i) the airlines' distribution of flights via OTAs represent only a minor share of their overall distribution and that (ii) from their overall online sales, airlines realise the main share through their own websites. Furthermore, the airlines' ability to increase sales through their own websites and, in particular for large airlines, the fact that they are considered as must-have brands, constitute a counterbalance for any possible market power of OTAs in their negotiations with airlines.

47. Given the relatively limited combined market shares of the parties in France, Germany, Italy, Spain, Portugal and the UK under all market delineations considered, the existence of a number of important competitors in these countries and the fact that market entry is fairly easy, the transaction does not lead to a significant impediment of effective competition.

VI. CONCLUSION

48. For the above reasons, the European Commission has decided not to oppose the notified operation and to declare it compatible with the internal market and with the EEA Agreement. This decision is adopted in application of Article 6(1)(b) of the Merger Regulation.

For the Commission
(signed)
Siim KALLAS
Vice-President

Exhibit 3.

Anticipated acquisition by Priceline.Com Incorporated of Kayak Software Corporation

ME/5882-12

The OFT's decision on reference under section 33(1) given on 9 May 2013. Full text of decision published 14 May 2013.

Please note that the square brackets indicate figures or text which have been deleted or replaced in ranges at the request of the parties or third parties for reasons of commercial confidentiality.

PARTIES

1. **Priceline.com Incorporated** (Priceline) is a public company headquartered in Norwalk, Connecticut, United States of America (U.S.A.). Priceline is the ultimate holding company of Priceline Group. The companies belonging to the Priceline Group are online travel agencies (OTAs) that search and book travel services from travel service providers (TSPs) such as hotels, airlines and car rental companies on behalf of customers. The Priceline Group operates under four main brands; Booking.com, priceline.com, Agoda.com and Rentalcars.com. These websites intermediate between customers and TSPs. Booking.com is the main brand operating in the UK.

2. **Kayak Software Corporation** (Kayak) is a public company headquartered in Norwalk, Connecticut, U.S.A. Kayak's primary business is the provision of a meta-search site (MSS), more commonly known as a price comparison site, allowing customers to search and compare prices for hotel rooms, airline tickets, package holidays and rental cars. Kayak's UK turnover in 2012 was approximately £ [ ].

TRANSACTION

3. Priceline intends to acquire 100 per cent of the shares in Kayak through a newly formed company, a wholly owned subsidiary of Priceline for a consideration of $1.8 billion[1] payable in cash and shares.

4. The parties formally notified the proposed acquisition to the Office of Fair Trading (OFT) on 14 March 2013. The OFT's administrative deadline expires on 9 May 2013.

JURISDICTION

5. As a result of the transaction the OFT considers that Priceline and Kayak (the parties) will cease to be distinct. The turnover test under section 23(1)(b) of the Enterprise Act 2002 (the Act) is not met since Kayak's UK turnover is less than £70 million.

6. For the purposes of the share of supply test under section 23(3) of the Act, the OFT considered, on a cautious basis, the narrowest reasonable description of services provided by the parties to be the supply of online travel search services to UK based customers[2] and the supply of online advertising services to UK based hotels. The OFT considered that the share of supply test is met given that on a UK revenue basis, the parties' combined share of supply in the provision of online travel search services to UK based consumers – in which the OFT considers the parties to overlap – is [25-35] per cent.

7. The OFT therefore believes that it is or may be the case that arrangements are in progress or in contemplation which, if carried into effect, will result in the creation of a relevant merger situation pursuant to section 23 of the Act.

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[1] Equivalent to £1.16 billion at an exchange rate of $1:£0.6432 as at 8 May 2013
[2] This includes overseas consumers searching for UK-based services.

MARKET DEFINITION

Background: The online travel services sector

8. The online travel services sector is characterised by TSPs, OTAs, MSSs and 'horizontal search engines' such as Google, Bing and Yahoo. TSPs provide hotel accommodation, flights, care hire, package holidays and cruises. They range in size from large multi-national hotel groups, airlines and car hire firms to family run businesses.

9. Customers can make direct online bookings with some but not all TSPs.[3] Customers also have the option of using OTAs, these websites provide online search and booking services, effectively intermediating between TSPs (some of which may not have booking functionality) and the customer. The customer also has the option of using other websites (MSSs or search engines) which provide the customer with search and/or price comparison services for various travel services and typically link the customer to the appropriate OTA or direct to the TSP where appropriate. Such services provided by OTAs, MSSs and search engines are free of charge to customers.

10. OTAs therefore serve as distribution channels for TSPs allowing customers to search and make bookings with TSPs. Priceline (Booking.com), Expedia and Lastminute.com are examples of OTAs. Some OTAs focus on a particular travel service such as hotel bookings while others distribute multiple types of travel services such as hotel room bookings, car hire and airline tickets.

11. MSSs are search engines that aggregate and simultaneously display the offerings of multiple OTA and TSP sites. Kayak, Trivago, Skyscanner and Travelsupermarket are a few examples of travel MSSs active in the UK. MSSs can be paid by a rate per click by OTAs or by receiving a percentage commission of the booking fee if a consumer who searches on an MSS subsequently goes to a TSP which results in the TSP making a booking. Essentially MSSs refer internet traffic either to OTAs or to TSPs direct.

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[3] Some TSP websites do not have a booking functionality and therefore the customer will typically book through an OTA.

12. Horizontal search engines provide internet traffic for OTAs, MSSs and TSPs through their main search results and through paid advertising links alongside their search results. Unlike MSSs, search engines are not dedicated to travel and provide less detailed search options and results. However, the OFT understands that the search engine Google has launched its own dedicated hotel and flight MSSs.

13. The online travel services sector is also characterised by the supply by OTAs and MSSs of certain back-end technology to various affiliates that provide travel related services.

Product scope

14. The parties' submitted that they operate in a two-sided market where one side of the platform comprises customers who are searching for hotel bookings and other travel services and the other side, TSPs looking to advertise their services and attract bookings from such customers.

15. The OFT did not need to conclude on the precise market definition for the purpose of analysing this merger given that any alternative formulation does not give rise to competition concerns. The OFT has therefore considered, without needing to conclude, the plausible impact of the merger on the supply of online travel search services to UK consumers and the supply of online advertising services[4] to TSPs.

16. In addition the OFT considers the parties overlap in the supply of back-end technology for online travel services by OTAs and MSSs.

17. The OFT's starting point in identifying the appropriate frame of reference is generally to consider first if the narrow candidate markets in which the parties overlap can be widened through demand-side substitution.

Distinction between online travel services provision and traditional 'bricks and mortar' travel agents

18. The parties submitted that the OFT should consider traditional bricks and mortar travel agents within the relevant product frame of reference given

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[4] The OFT considers 'online advertising services' in this case to include the online channelling of customers to UK-based TSPs and not just merely advertising their services/offers.

that services provided by them are not significantly different to those provided by online OTAs.

19. In its past decisional practice the European Commission (EC) has left open whether bricks and mortar travel agencies and online distribution were distinct markets or part of the same market. The EC has, however, noted that the distribution of travel services through online channels might constitute a separate market.[5]

20. The Competition Commission (CC) in its merger inquiry report of *Thomas Cook/Co-operative Group/Midlands Co-Operative*[6] indicated that there is a degree of differentiation between online and high street travel service offerings. The CC said: '[h]igh street agents have traditionally offered an element of service and advice as a feature that distinguishes the channel from other forms of distribution'.

21. Although this question was not specifically put to third parties, none of the third parties contacted by the OFT raised the point that bricks and mortar channels should be considered in the same market as online travel services. As such the OFT has adopted a cautious and narrow approach and assessed this transaction on the basis of online travel services.

Distinction between OTAs and MSS

22. The OFT has considered the distinction between OTAs and MSSs. The parties submitted that online travel booking services are distinct from online travel search services because:

    i.   travel search services and booking services are not always supplied together

    ii. Kayak and all other MSSs do not have a booking functionality

    iii. there is intense competition in the supply of these services between OTAs and TSPs.

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[5] COMP/M.6163 – Axa/Permira/Opodo/GoVoyages/eDreams
[6] Paragraph 7.6

23. In support of their contention that OTAs and MSSs do not form part of the same product market, the parties note that, in practice, Kayak only contracts directly with large hotel chains that have their own booking functionality whereas Priceline contracts with a much broader range of hotels including both large and small and with and without its own booking functionality because they can book through Priceline.

24. Set against this, third party responses indicated that OTAs both compete and have a vertical relationship with MSSs and TSPs. Specifically, the parties compete insofar as they both seek to obtain traffic by providing online travel search services to consumers and providing online advertising services to TSPs. However, third parties also noted that the key difference between an MSS and OTA was the fact that the former lacks ability for a customer to book a travel service and merely provides a gateway for a customer to link directly to a TSPs site.

25. To make direct use of an MSS, a TSP needs to have its own booking functionality. This is particularly relevant for hotels as they do not all have booking functionality on their own websites. A hotel dealing with Booking.com need only upload prices onto Booking.com's extranet. Booking.com will organise the bookings and to the extent that booking functionality is costly or difficult to set-up, this distinction limits the range of hotels that can use MSSs directly for the purposes of advertising services.

26. The OFT notes that through its 'Book Kayak' functionality, a customer can proceed to book and pay for some services instead of proceeding to an OTA or TSP website to complete their booking. However, when customers use 'Book Kayak', they make a booking through an affiliate service provided by an OTA (for example, Priceline, Expedia, Travelocity or getaroom). The booking is actually completed by the OTA booking system. Payment is also made through the OTA and the OTA handles customer service. These features are clearly signposted on the Kayak website. Kayak shares the commission the OTA receives from the TSP, much as they would if they channelled the customer to an OTA website. The OFT also notes that [ ] number of bookings were made by 'Book Kayak', amounting to [ ] revenue of approximately £[ ] in 2012 in the UK.

27. The OFT notes that Booking.com has [ ] customer care employees, [ ] of which are in the UK. By comparison, Kayak has [ ] to deal with individual

bookings in the UK and [ ] customer care employees in the USA, all of whom focus on issues relating to the website.[7] This is a consequence of Kayak operating a different business model to an OTA as regards the ability to book travel services online, such as, Booking.com. Kayak [ ] operate a booking system that is [ ] technology on which it is reliant and with which [ ] booking commission.

28. Based on the evidence available to it, the OFT considered that the parties do not overlap in booking services and so does not consider this overlap further. Nevertheless, the OFT has assessed whether any non-horizontal effects arise as a result of the merger.

Distinction between different travel service segments

29. The parties submitted that it would not be appropriate to distinguish markets separately by the type of TSP, for example flights, hotels, car rental, tours and packages. The parties submitted that most OTAs and TSPs that are active in the UK provide most, if not all, types of travel service and that this is an indication there is considerable supply side substitutability between the various types of travel service.

30. The EC could not exclude that within the possible market for the online distribution of leisure travel services, a possible sub-market for the online distribution of leisure flights might exist.[8] As mentioned above, in identifying the relevant product market particular regard will be had to demand-side substitution factors[9] and different segments of travel services such as flights, hotel rooms and car hire are clearly not interchangeable from a consumers' perspective.

31. The OFT notes that there may be demand side complementarities which may incentivise firms to provide these services together. For example, consumers may prefer 'one-stop' shopping. There may also be some economies of scope in terms of the design and management of websites and databases in providing the different segments of travel services together. However, the OFT also notes that Priceline's business in the UK receives [ ] per cent of its UK revenue from hotel bookings and car rental.

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[7] Parties submission
[8] COMP/M.6163 – Axa/Permira/Opodo/GoVoyages/eDreams
[9] Merger Assessment Guidelines, paragraph 5.2.6

Kayak receives [ ] per cent of its revenue from flights and about [ ] per cent of its revenue from hotel bookings. This indicates the parties each focus on particular types of travel services in the UK.

32. For these reasons, the OFT considers it may not be appropriate to aggregate different types of travel services into a single frame of reference. On a cautious basis and for the purposes of this analysis, the OFT considered different types of travel service separately. Therefore the OFT focused its analysis on hotels and car rental.

Online advertising by OTAs and MSSs to certain TSPs

33. The parties submitted there is a relevant market for the supply of online advertising/distribution services to TSPs.[10] The parties also submitted there is a relevant market in the supply of advertising to OTAs by MSSs.

34. A TSP looking to attract bookings or customer traffic can market itself through horizontal search engines, MSSs and OTAs. Consumers may go directly to an OTA which may provide a booking function to the TSP or they may use the online advertising services of an MSS or horizontal search engine. Similarly, consumers may go directly to an MSS or to a horizontal search engine which may redirect them to the TSP.

35. The parties submitted that MSSs (vertical search), and horizontal search engines are largely active upstream of OTAs and do not overlap in the supply of online advertising services to TSPs. This vertical relationship could be described as being the supply of advertising services to OTAs by MSSs. However, MSSs channel a portion of consumers to OTAs and a portion to TSPs. In the case of Kayak, [ ] per cent of 2012 revenue relating to UK-based hotels came from OTAs and [ ] per cent came from TSPs. In 2011, [ ] per cent came from OTAs and [ ] per cent came from TSPs. In relation to UK based car hire firms, [ ] per cent of Kayak's 2012 revenue came from OTAs and [ ] per cent came from TSPs. In 2011, [ ] per cent came from OTAs and [ ] per cent came from TSPs.

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[10] The OFT uses the term online 'advertising services' by OTAs and MSSs to certain TSPs'throughout rather than distribution to avoid confusion. This excludes booking services.

36. A number of responses to third party questionnaires have confirmed that OTAs both compete and have a vertical relationship with MSSs. The parties compete insofar as they both seek to obtain traffic.

37. The parties also submitted that Kayak contracts directly with large hotel chains. This would indicate that the parties do overlap in advertising services to TSPs, notwithstanding that Booking.com serves a wider range of TSPs in the hotel sector. The car hire sector is more concentrated and the parties appear to work with a similar set of TSPs.

38. Horizontal search engines provide internet traffic for OTAs, MSSs and TSPs through their main search results and through paid advertising links alongside their search results. The EC has previously distinguished between vertical and horizontal internet searches in the past. In a merger review between *Microsoft-Yahoo! Search Business* the EC said: 'General internet search must be distinguished from vertical internet search, which focuses on specific segments of online content such as for example legal, medical, or travel search engines. Contrary to general internet search engines, which index large portions of the internet through a web crawler, vertical search engines typically use a focused crawler that indexes only web pages that are relevant to a pre-defined topic or set of topics'.[11]

39. However, the OFT also notes that two major suppliers of horizontal search engines, Google and Microsoft, have entered the MSS space with Google Flights, Google Hotel Finder and Bing Travel. Such entry could be taken as an indication that the ability of horizontal search engines to compete with OTAs and MSSs is limited and would not be a strong competitive constraint on OTAs and MSSs.

40. In assessing the effect of the merger, the OFT will primarily be concerned with the parties' overlap in the provision of online advertising services to large hotel chains and car hire firms. On a cautious basis, the OFT will exclude horizontal search services from the frame of reference.

Online travel search services by OTAs and MSSs to consumers

41. Consumers can search for travel services on horizontal search engines, OTAs or MSSs. All of these provide search services to consumers for free.

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[11] COMP/M.5727 – Microsoft/Yahoo! Search business

As with online advertising services to TSPs, the parties submitted that OTAs and MSSs compete with horizontal search engines. The OFT considered that distinctions mentioned between OTAs, MSSs and horizontal search engines in relation to online advertising services to TSPs are also relevant to online search services to consumers. This suggests that horizontal search engines would not be a strong competitive constraint with regard to consumers.

42. The parties further submitted there are fundamental differences between the search functionality of OTAs and MSSs. The parties argued that MSSs aggregate and simultaneously display the offerings of multiple OTAs and TSPs whereas OTAs show competing offers from different TSPs for a specific travel service - for example, a hotel room reservation in a specific city. However, the parties have not provided any substantive evidence on the importance customers place on the distinction between the search functionality offered by OTAs and MSSs.

43. OTAs and MSSs both obtain revenue from attracting consumers to their websites. OTAs earn commission from TSPs if consumers make a booking on their website. MSS are paid either per-click or per booking made from traffic they forward to TSPs or OTAs. Therefore OTAs and MSSs have an incentive to compete to provide travel search services to consumers. This includes competition for traffic which may eventually flow through an MSS to an OTA, that is where the parties have a vertical relationship, or through an MSS direct to certain TSP (those with booking functionality), that is where there is a horizontal relationship.

44. OTAs would prefer consumers to come directly to them rather than through an MSS, as they will have to share a proportion of revenue with the MSS, either per unit of traffic, or a portion of any eventual booking commission. This implies OTAs and MSSs are likely to compete in online travel search services to consumers.

45. The OFT considers the competitor set of OTAs and MSSs to be very similar to online advertising services as discussed above. On a cautious basis, therefore, the OFT will focus on competition between OTAs and MSSs. The relevant overlapping travel search services in this case are those relating to car hire and hotels.

Supply of back-end technology for online travel search services by OTAs and MSSs

46. Priceline provides back-end technology for online travel search and booking services to third party website operators through its 'affiliates programme'. This technology enables third party users to market under their own brands, for example airline companies, the travel services available on the websites operated by the Priceline Group.

47. The parties submitted that generally this technology can be supplied using two basic models. Third party website operators can contract to use so-called 'white label' website from the OTA, which is branded to reflect the third party's brand. Alternatively, the third party website operator can connect its own website to the OTA's booking engine which will provide a data feed to the third party website.

48. Kayak also has an 'affiliate programme' through which it enables third party websites, for example lonelyplanet.com and about.com, to offer Kayak's MSS functionality on their own websites. The parties' offerings are differentiated in that Kayak does not offer booking functionality.

49. The parties submitted that Kayak is, to a certain extent, a user of such back-end technology for its 'Book Kayak' functionality as Kayak has contracted with the 'affiliate' or 'white label' programmes of Expedia, Travelocity and getaroom and therefore the parties do not overlap.

50. Whilst Kayak does not have a booking functionality, there is nevertheless an overlap in travel search services between the parties' respective 'affiliate' programmes. However, based on the evidence available to it, the OFT considered that the parties do not overlap to a material degree in the supply of back-end travel search technology and so will not consider this overlap further in its competitive assessment.

Geographic scope

51. The parties submitted that because services are internet based they can be provided globally and are not constrained by national or regional boundaries.

52. However, the parties noted that the EC has previously defined the markets for the online distribution of travel services as national in scope, and has cited language barriers as the primary reason for this[12] The parties also noted that for similar reasons, the OFT has in the past assessed the markets for online advertising of consumer finance products and online search services on a national basis[13] but recognised that the OFT can leave the geographic scope open. The OFT agrees that the geographic scope can be left open but on a cautious basis will adopt the UK as its frame of reference.

Conclusions on relevant frame of reference

53. In summary and without concluding on the precise relevant market definition for this case, the OFT has taken a cautious approach and has assessed the effect of this transaction against the following frames of reference:

    i.   Online advertising services to UK-based hotels and car hire firms by OTAs and MSSs in the UK.

    ii.   Online travel search services for UK-based consumers relating to hotels and car hire by OTAs and MSSs in the UK.

    iii. Back-end travel search services technology to UK-based firms by OTAs and MSSs in the UK.

COMPETITIVE ASSESSMENT

54. The OFT considered its competitive assessment in relation to online travel sector. The OFT assessed the following theories of harm:

    i.   horizontal unilateral effects in the supply of online advertising services of hotel and car hire by OTAs and MSSs to TSPs, and travel search services relating to hotel and car hire to consumers in the UK

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[12] EU Commission decision dated 30 May 2011, COMP/M.6163 – Axa/Permira/Opodo/Go Voyages/eDreams, paragraph 29.

[13] Google/BeatThatQuote, OFT decision dated 1 July 2011, paragraphs 26-28 and 34-36.

ii.   coordinated effects in the hotel and car hire sectors through the automation of detection and enforcement of rate parity deviations

iii.   foreclosure of rival OTAs and

iv.   conglomerate effects of Priceline bundling or tying its' other portfolio brands.

HORIZONTAL ISSUES

Unilateral effects in the online hotel sector

Shares of supply

55.   The parties submitted share of supply data based on internet traffic. Internet traffic was calculated based on the number of unique visits to websites within comScore's 'travel' category.[14] The parties provided the data on a number of segments. The data showed that Priceline had approximately [ ] times the number of 'hits' than Kayak across all relevant segments with the maximum combined share of supply being [10-20] per cent in the OTA category (which included Kayak's hit data).[15]

56.   The OFT had significant reservations about the appropriateness of using an approach based on internet traffic to measure share of supply. The data was likely to exclude overseas consumers searching for UK-based TSPs and counts traffic related to non-overlapping travel searches such as flights. As a result the OFT considers that the internet traffic metric is likely to understate the parties' combined share of supply in the relevant goods and services.

57.   The OFT considered net revenue, volume and gross booking value (GBV) for the supply of online travel search services to UK consumers and the supply of online advertising services to TSPs as a more appropriate metric of the parties' share of supply. On the basis of information provided by the parties the OFT's estimate of shares of supply is outlined in Table 1 below:

[14]comScore is a firm which monitors internet traffic data (that is, 'hits'). The period covered by the data is 1 November 2011 to 31 October 2012

[15] The parties included the Kayak hits data in the OTA data with the caveat that their position is that there is no horizontal overlap between the parties.

Table 1: Estimate of share of supply for online travel search services to consumers and online advertising services to hotels based on Revenue, Volume and GBV[16,17]

Metric	Customer	Priceline (%)	Kayak (%)	Combined (%)
Revenue	Consumer	[25-35]	< 1	[25-35]
Revenue	Hotel	[35-45]	< 1	[35-45]
Volume	Consumer	[25-35]	< 2	[25-35]
Volume	Hotel	[35-45]	Not supplied	[35-45]
GBV	Consumer	[25-35]	Not supplied	[25-35]
GBV	Hotel	[35-45]	Not supplied	[35-45]

Online advertising services of hotels by OTAs and MSSs

58. The OFT noted that the increment to Priceline's share of supply based on revenue is very small at [< 1] per cent. The OFT received no third party concerns relating to unilateral effects. In terms of whether the parties are close competitors, OTAs and MSSs are distinguished by booking functionality. OTAs have a booking functionality when advertising hotel services whereas MSSs tend to merely channel the consumer wishing to book a hotel room either to an OTA or direct to a hotel.

59. Third parties were asked whether they thought OTAs and MSSs compete and are close competitors. Third parties representations were somewhat mixed, but a significant proportion indicated that OTAs and MSSs do compete and are to some extent interchangeable. However, third parties generally identified other OTAs, such as Expedia and Travelocity, as close competitors to Priceline and similarly other MSSs, such as Trivago and TravelSupermarket, as close competitor to Kayak. Furthermore, third parties indicated that there will remain a number of alternative OTAs and MSSs following the transaction.

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[16] The parties were unable to provide an accurate, reliable estimate of the total market size and therefore the OFT estimated the market size based on data from market reports and information from the merging and third parties.

[17] 'Consumer' relates to the supply of online travel services to UK consumers (relates to domestic and overseas hotel use) and 'hotel' relates to the supply of online advertising services to UK-based hotels (domestic or overseas consumers).

60. That said, the OFT notes that Priceline's 2012 Annual Report lists a variety of current and potential competitors that include MSSs. Furthermore, Kayak's IPO prospectus also mentions competition from general search engines that could reduce their traffic.

61. One third party, active in the general search sector said that competition in search, including travel search, is vibrant and characterised by the presence of a large number of successful travel search services and therefore did not have any concerns in relation to the proposed merger. Also, one Kayak internal document indicated that Kayak considered itself [ ] in the UK [ ] of strong local competition.

62. Priceline is substantially larger than Kayak and so the increment is very small. A number of third parties have also indicated they do not consider the parties to be particularly close competitors and there are a number of other more significant competitors to both parties in the supply of online advertising services. Based on this evidence, the OFT does not consider this transaction creates a realistic prospect of a significant lessening of competition (SLC) on the basis of unilateral effects through price increases or a general degradation of quality of service in the supply of online advertising services by OTAs and MSSs to certain hotels.

Supply of online travel search services by OTAs and MSSs to consumers

63. In terms of online travel search services, the parties' offerings are somewhat differentiated. MSSs allow customers to search across multiple OTAs and MSSs at once whereas with an OTA a consumer can only search on that OTA. It is not clear to what extent consumers find this distinction important.

64. An important characteristic of this market is that consumers are not charged for search services but in theory consumers could be affected by a general degradation in quality of service, for example, through the quality of functionality on websites. However, as with the OFT's consideration of the supply of online advertising services by OTAs and MSSs to certain TSPs, the increment in the supply of online travel search services by OTAs and MSSs to consumers is minimal. Table 1 above shows that on a revenue basis the combined share of supply is [25-35] per cent with an increment of less than one per cent [ ].

65. In addition, online travel search services to consumers are also characterised by a large number of other significant competitors and the parties are not in fact close competitors.

66. On this basis, the OFT considers this merger does not create a realistic prospect of an SLC with regard to the supply of online travel search services by OTAs and MSSs to consumers through either price increases (consumers are not currently charged for this service) or a general degradation of quality of service.

Unilateral effects in the online car hire sector

Share of supply

67. As with hotels, the OFT encountered substantial difficultly in measuring the size of the relevant hypothetical markets. Unlike the hotels sector, the parties were unable to supply the OFT with share of supply figures on either revenue or volume metrics, but did supply internet traffic data which as explained above, the OFT had significant reservations. The 2012 PhoCusWright UK Online Travel Overview estimates that the gross bookings in the UK car rental sector were £1.38bn in 2011 and forecast them to be £1.43bn in 2012, with approximately £0.3bn booked through supplier websites in each year. These figures refer to use of cars hired from UK-based TSPs. Equivalent data for UK-based consumers was unavailable. The OFT was therefore unable to estimate shares of supply.

Online advertising services to UK-based car hire firms by OTAs and MSSs

68. Priceline had about £[ ] of revenue attributable to UK-based TSPs in 2012, mostly through their rentalcars.com brand. Kayak had just £[ ] of similar revenue[18]. Kayak, therefore, had [ ] per cent of the revenue that Priceline had in this segment. The OFT considers that such a small increment makes it unlikely that significant unilateral effects would arise as a result of the merger.

69. Furthermore, the OFT contacted a number of the parties' customers (car hire firms) none of whom raised any concerns about the merger. The OFT

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[18] These figures were provided to the OFT by the parties.

considers that the absence of concerns is consistent with the parties' limited position in this market segment.

70. Given the available evidence, the OFT considers this merger does not create a realistic prospect of an SLC with regard to the supply of online advertising services to UK-based TSPs by OTAs and MSSs through either price increases or a general degradation of quality of service.

Online travel search services by OTAs and MSSs to consumers in the UK

71. Priceline earned approximately £[ ] of revenue associated with UK-based consumers in 2012, mostly through their rentalcars.com brand. Kayak had just £[ ] of similar revenue.[19] Kayak therefore earned [ ] per cent of the revenue of Priceline through this service. The OFT considers that such a small increment makes it unlikely that significant unilateral effects would arise as a result of the merger.

72. Given that consumers are not charged for search services and the parties limited position in the market and the absence of any concerns, the OFT considered that there is no realistic prospect of an SLC on the basis of unilateral effects in travel search services for UK-based consumers relating to car hire by OTAs and MSSs.

Barriers to entry and expansion

73. The parties submitted that the costs of entry are low, and that there have been several instances of entry in recent years. As noted above, the OFT understands that the search engine Google has recently launched its own dedicated hotel and flight MSSs. The OFT does not need to conclude on barriers to entry and expansion in this case.

Buyer power

74. The OFT also assessed the extent to which any existing buyer power may be relied upon to protect customers and the effect the merger may have on any existing buyer power. The OFT also notes that an individual's negotiating power will be stronger if it can easily switch its demand away

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[19] These figures were provided to the OFT by the parties.

from the supplier.[20] The OFT further notes that a number of alternative OTAs such as Expedia, Travelocity and others will remain in the market post the transaction. A number of alternative MSSs will also remain such as Skyscanner and Travelsupermarket. TSPs therefore have a number of alternatives to the parties

75. A number of the parties' customers (hotels), but not all, indicated that they consider that they have bargaining power with the parties and that such bargaining power is unlikely to be affected by the merger.

76. However, the OFT has not found it necessary to conclude on countervailing buyer power in this case.

Coordinated effects in the online hotel sector

77. As discussed above, Priceline and Kayak both have a horizontal and non-horizontal relationship. Coordinated effects may arise when firms operating in the same market recognise that they are mutually interdependent and that they can reach a more profitable outcome if they coordinate to limit their rivalry that could, in turn, lead to an SLC.[21]

78. Coordination can take different forms including, but not limited to, agreeing to keep prices higher than would otherwise be possible in a competitive market, or dividing up the market, for example, by each party agreeing not to transact with hotels currently transacting with the other or along geographic lines. Coordination can also be explicit or implicit.[22]

79. In assessing coordinated effects the OFT will analyse certain characteristics of the market that could be conducive to coordination. One relevant factor in this case is whether there is evidence of whether firms in the market were coordinating pre-merger.

80. If in the view of OFT the pre-merger market showed (tacitly or explicitly) coordinated outcomes, the relevant question for the OFT's merger

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[20] Merger Assessment Guidelines paragraph 5.9.2

[21] Mergers Assessment Guidelines, paragraph 5.5.1

[22] Mergers Assessment Guidelines, paragraph 5.5.3

assessment is whether the conditions for coordination are strengthened or weakened as a result of the transaction.[23]

The merger will help automate Priceline's detection and enforcement of rate parity deviations

81. The OFT's inquiries with third parties resulted in a complaint focussing on a complaint that the merger will help Priceline automate detection and enforcement of rate parity deviations.

82. The OFT received concerns from Skoosh[24] that Priceline could use Kayak to automate the detection of deviations from rate parity[25] making enforcement easier. Skoosh indicated that, at present, these activities are labour intensive and with Kayak's technology, Priceline could increase its ability to check other travel websites in real time and find discrepancies in rate parity.

83. The parties submitted they do not agree that price parity agreements and the ability to monitor compliance facilitate coordination. In any event, the parties claim that Priceline already has a robust automated system for parity checks which will not be enhanced by the merger. Priceline has access to this information via other technology, namely datascrapers, such as [ ] which gather real time pricing information displayed on OTA websites.

84. The parties further submitted that even if Priceline wanted to use Kayak for this purpose, Kayak does not provide a comprehensive and reliable source of pricing information for parity checks. Kayak does not store its OTA and counterparty (TSPs) pricing data on its own systems. Instead when a consumer enters a search into Kayak, Kayak takes the criteria and runs the same search on various OTA and TSP price databases which it has access via a direct feed. The pricing data is provided in real time and consequently Kayak never has a full set of an OTA or TSP's prices.

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[23] Merger Assessment Guidelines, paragraph 5.5.8
[24] Skoosh (a competitor of Priceline) publically announced its concerns to the OFT, regarding the merger, through publication in Mlex on 20 March 2013.
[25] Rate parity agreements may prevent hotels from offering hotel rooms at lower prices to other websites.

85. The OFT considers that if Priceline were to use Kayak in this way to detect price parity deviations, it is clear that Priceline would be limited to the searches carried out by Kayak's customers which may not be an effective detection mechanism. In any event, it would appear that more effective mechanisms are already open to use by Priceline in the form of various datascraping technology. On this basis the OFT does not consider this theory of harm to be credible.

Conclusion

86. On the evidence available, the OFT does not consider that the merger strengthens any coordination that may already exist in this market. The OFT therefore finds no realistic prospect of the merger leading to an SLC as a result of coordination.

NON HORIZONTAL ISSUES

87. As mentioned above, the merger has both horizontal and non-horizontal aspects. The OFT assessed whether the merger will provide Priceline with the opportunity to foreclose rivals from both online travel search services to consumers and online advertising services to TSPs by using Kayak to reduce internet traffic flowing to rivals and increase the cost to rivals. In addition, the OFT assessed whether conglomerate effects could arise through Priceline adopting bundling or cross selling strategies in order to gain increased fees from TSPs.

88. In line with its Merger Assessment Guidelines, the OFT frames its foreclosure and conglomerate analysis by reference to the following three questions:

   - **Ability**: would the merged entity have the ability to weaken the competitive offering of rival services, for example through raising prices or refusal to supply them?

   - **Incentive**: would the merged entity find it profitable to do so?

- **Effect**: would the effect of any action by the merged entity be sufficient to reduce competition in the affected market to the extent that it gives rise to an SLC.[26]

Foreclosure of rival OTAs from online travel search services and online advertising services in the hotel and car hire sector

89. A number of hotels and competitors complained to the OFT that the merger could represent a foreclosure opportunity for Priceline by using the following foreclosure strategies:

    i.   using Kayak's website to bias search results in favour of Priceline's offerings, and

    ii. raising rivals costs through more aggressive bidding for advertising space on Google and increasing the costs to other OTAs and TSPs.

Foreclosure through bias search results

90. The first question to consider is Priceline's ability to engage in such a foreclosure strategy. It may be the case that with ownership of Kayak, Priceline may have the ability to manipulate search results on the Kayak site so as to favour Priceline's offerings. However against this, the OFT considered a number of factors submitted to it by the parties and third parties during the course of its investigation.

91. First, the OFT notes that the PhoCusWright 2012 European Consumer Travel Report[27] said that around 64 per cent of UK customers booking travel services visit at least three websites when comparing and choosing travel products. Second, consumers would quickly notice if Kayak is not providing an unbiased picture of the offerings it compares and its usage by consumers would decline as they could switch to using other alternative websites. Third, Priceline has informed the OFT that it will continue to develop the business of Kayak and will allow Kayak to operate independently.

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[26] Merger Assessment Guidelines paragraph 5.6.6
[27] See 3rd Edition September 2012, figure 33

92. The second question to consider is Priceline's incentive to engage in such foreclosure strategy, and the OFT has assessed potential gains and losses to Priceline of manipulating Kayak's search service in favour of its own offerings. Priceline could potentially earn more revenue from biasing the results but this could be damaging to Kayak's business as other OTAs could stop using Kayak's website. The OFT considers that the losses would outweigh any gains to Priceline of this strategy, particularly given Kayak's limited size in this market. Furthermore, one competitor confirmed that it would be unrealistic for Kayak to either exclude other OTAs or prioritise Priceline's offers on its website.

93. The third question to consider is whether the effect on competition of Priceline undertaking such a foreclosure strategy would be sufficient to reduce competition to the extent that it would give rise to an SLC. The OFT considers that in order for there to be a sufficient effect on competition to lead to an SLC, Kayak would need to be a 'must have' website for other OTAs to generate traffic to their websites. The OFT did not receive any evidence to suggest that Kayak is a 'must have' MSS for OTAs and TSPs. On the contrary, the OFT notes that Kayak is one of several MSSs available to UK customers and MSSs are one of several means by which OTAs and TSPs generate traffic to their websites.

94. Consequently, considering the evidence in the round, including the minimal size of Kayak's share of supply, the OFT considers that even if Priceline were to attempt to engage in such foreclosure activity, the merger does not raise the realistic prospect of an SLC on the basis of biased search results.

Foreclosure through raising rivals' costs

95. One competitor of Priceline raised concerns that Priceline and Kayak would bid more aggressively for advertising space on Google following the merger. The competitor indicated this would harm competition by raising the costs of acquiring traffic through Google for competitors and therefore putting them in a weaker competitive position.

96. The competitor was unable to identify why the parties would change their behaviour in this way as a result of the merger. The OFT considered that as advertising is a route by which OTAs and MSSs attract customers, it is not implausible that more intense advertising by the parties may even enhance

competition. The OFT does not consider this to be a credible theory of harm.

97. The same competitor also raised concerns that, through Kayak, Priceline could increase advertising fees/price per click it charges to OTAs following the merger. The OFT considers that given Kayak's small share of supply, it does not represent a major source of traffic for OTAs and as noted above, MSSs are not the only source for OTAs to attract traffic to their websites. The OFT does not consider this to be a credible theory of harm.

98. Consequently, the OFT considers that the merger will not create a realistic prospect of an SLC on the basis of the parties increasing rivals' costs.

Conglomerate effects

99. One customer raised concern that given the parties increased share of hotel search results and advertising, Priceline could use Kayak to leverage its other brands through bundling or tying to force other counterparties to sign up to one or more other Priceline brands. The third party customer submitted that this would be to the detriment of other rivals in the market.

100. In terms of Priceline's ability to engage in bundling or tying, the parties submitted that given Kayak's very small size in the UK, particularly the hotel sector, it did not present the Priceline Group with any significant incremental leverage with TSPs as a result of the merger. In any event, the vast majority of Kayak's customers are OTAs with whom there is no opportunity for bundling or tying.

101. More fundamentally, the parties submitted that Priceline would not have the incentive to engage in bundling or tying its other brands to TSPs. It would not financially benefit the Priceline Group to grow Kayak's direct relationships with TSPs at the expense of Booking.com or other brands. It also noted that it does not engage in such practices at present.

102. Furthermore, the online travel services sector is characterised by TSPs signing up to multiple OTAs and MSSs in any event. They do this so that they can increase exposure to traffic as much as possible and ultimately to increase bookings. It is not, therefore, clear what further incentive the merger would present Priceline to engage in bundling or tying given that TSPs are already signing up to multiple sites.

103. The OFT, therefore considers that the effect on competition is unlikely to be sufficient to give rise to an SLC, given the features of the market and Kayak's small size. Consequently, the OFT considers there is no realistic prospect of an SLC on the basis of conglomerate effects.

THIRD PARTY VIEWS

104. The OFT has received several complaints about the merger from both customer and competitor third parties. Third party comments have been considered where appropriate above.

105. The majority of concerns focussed on theories of harm relating to foreclosure activities and conglomerate effects. However, the vast majority of respondents did not raise any concerns regarding the merger.

ASSESSMENT

106. The parties are both active in the supply of online travel search services to consumers and online advertising services to TSPs. Priceline is an OTA and Kayak is an MSS and although there are horizontal aspects to the merger, the OFT also considered non-horizontal aspects as well.

107. Without concluding on the precise relevant market definition for this case, the OFT considers the relevant frames of reference for its analysis to be online advertising services to both UK-based hotels and car hire firms by OTAs and MSSs, online travel search services to UK consumers by OTAs and MSSs both in the hotel and car hire sectors and the supply of back-end travel search technology to UK based firms by OTAs and MSSs.[28]

108. The OFT considered a number of theories of harm in its competitive assessment in each of the relevant frames of reference, including horizontal unilateral and coordinated effects as well as non-horizontal foreclosure of rivals through various strategies involving biased results on the Kayak website favouring Priceline's offerings and raising rivals costs. In addition the OFT considered certain conglomerate effects concerning the parties' ability to bundle or tie their brand portfolio.

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[28] The OFT considered that the parties' overlap in the supply of back-end travel search technology was limited and did not assess the competitive effects further.

109. Whilst the OFT considered that the parties compete in each relevant frames of reference, the minimal increment to the share of supply did not raise any unilateral concerns that the merger would give rise to a realistic prospect of an SLC. The OFT considered that each party had other close and more significant competitors left in the market.

110. Whilst some third parties raised various concerns, the OFT considered that on the basis of available evidence such concerns were unlikely to give rise to a realistic prospect of an SLC. The concerns regarding horizontal coordinated effects focussed on the merger enabling Priceline to use Kayak's technology to automate in detecting and enforcing rate parity. The evidence considered showed that more effective technology than Kayak's technology already exists in the market that could enable coordination such as datascrapers.

111. Concerns were also raised in relation to the parties engaging in various foreclosure activities and conglomerate bundling or tying. On the available evidence, it was not clear to the OFT that the parties would have the ability or the incentive, as a result of the merger, to engage in such activities.

112. Consequently, the OFT does not believe that it is or may be the case that the merger may be expected to result in a substantial lessening of competition within a market or markets in the United Kingdom.

DECISION

113. This merger will therefore **not be referred** to the Competition Commission under section 33(1) of the Act.

Exhibit 4.

Flash Eurobarometer 334

Attitudes of Europeans Towards Tourism

REPORT

Fieldwork: January 2012

Publication: March 2012

Flash Eurobarometer 334

Attitudes of Europeans Towards Tourism

Conducted by TNS Political & Social at the request of
Directorate-General Enterprise

Survey co-ordinated by Directorate-General for
Communication

TABLE OF CONTENTS

INTRODUCTION 4

MAIN FINDINGS 6

1.   RESEARCHING AND PLANNING A HOLIDAY... 8

    1.1   Reasons for going on holidays in 2011 8

    1.2   Respondents' motivation to choose the same place for holidays 12

    1.3   Sources of information most used when planning the holidays 17

    1.4   How respondents organized their holidays in 2011 22

2.   THE HOLIDAY EXPERIENCE 26

    2.1   Destinations for the main holidays taken in 2011...............................26

    2.2   Types of holidays taken in 2011 35

    2.3   Means of transport used for going on holidays in 2011 41

    2.4   Satisfaction with the main holidays taken in 2011 47

3.   TRAVELLERS' PROFILE IN 2011.. 54

    3.1   Proportion of respondents who travelled in 2011...............................54

    3.2   Holidays of less than four nights taken in 2011..................................59

    3.3   Personal holidays of minimum 4 nights taken in 2011 65

INTRODUCTION

This Flash Eurobarometer, "Attitudes of Europeans Towards Tourism" (No 334), was conducted at the request of the Directorate-General for Enterprise and Industry in the 27 EU Member States and in seven additional countries: Croatia, Turkey, the Former Yugoslav Republic of Macedonia, Norway, Iceland, the Republic of Serbia and Israel. Serbia and Israel were not included in previous waves of this survey.

The objectives of the survey were to study: respondents' motivation for going on holiday in 2011, the types of research and modes of organisation that people use before taking a holiday, attitudes towards tourism (e.g. preferred holiday destinations, and the types of holiday that respondents favour), respondents' travel profiles in 2011, the reasons why respondents did not go on holiday in 2011, including the potential impact of the current economic crisis and respondents' holiday plans for 2012.

The interviews were carried out by telephone (fixed-line and mobile phone) between 10 and 14 January 2012 with nationally representative samples of citizens in the 27 EU Member States, Croatia, Turkey, the Former Yugoslav Republic of Macedonia, Norway, Iceland, the Republic of Serbia and Israel. The sample size varied between countries, ranging from about 500 in the smallest countries to about 1.500 in the largest (see section "Technical Specifications" in the Annexes where the actual sample sizes for the 34 countries are indicated).

To correct for sampling disparities, a post-stratification weighting of the results was implemented, based on the main socio-demographic variables.

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The Eurobarometer web site can be consulted at the following address:
http://ec.europa.eu/public_opinion/index_en.htm

We would like to take the opportunity to thank all the respondents across the continent
who have given of their time to take part in this survey.
Without their active participation, this study would simply not have been possible.

<u>Note</u>

5

ABBREVIATIONS	

EU27	European Union – 27 Member States
NMS 12	12 new Member States
DK/NA	Don't know / No answer
BE	Belgium
BG	Bulgaria
CZ	Czech Republic
DK	Denmark
DE	Germany
EE	Estonia
EL	Greece
ES	Spain
FR	France
IE	Ireland
IT	Italy
CY	Republic of Cyprus
LT	Lithuania
LV	Latvia
LU	Luxembourg
HU	Hungary
MT	Malta
NL	The Netherlands
AT	Austria
PL	Poland
PT	Portugal
RO	Romania
SI	Slovenia
SK	Slovakia
FI	Finland
SE	Sweden
UK	The United Kingdom
HR	Croatia
TR	Turkey
MK	Former Yugoslav Republic of Macedonia
IS	Iceland
NO	Norway
RS	Republic of Serbia
IL	Israel

MAIN FINDINGS

Researching and planning a holiday

- Almost half (48%) of the people who went on holiday for at least four nights in 2011 did so for rest/recreation, while just under a third (32%) took a holiday in order to spend time with their family.
- When deciding whether to return to the same place for another holiday, 50% of respondents said the most important factor was the location's natural features, such as the weather, while 32% cited the quality of accommodation.
- A majority (52%) of respondents said that the recommendations of friends, colleagues or relatives were key factors when making decisions about travel plans.
- In terms of organising their 2011 holiday, a majority (53%) of respondents said that they made their arrangements via the internet.

The holiday experience

- A majority (56%) of EU respondents who went on holiday in 2011 holidayed in their own country; over four out of 10 (44%) went to another EU country.
- Spain was the most visited EU country, followed by Italy and France.
- Half (49%) of the people who took a holiday organised the elements of their trip, such as transportation and the accommodation, separately – far more than those who chose to go on package holidays or all-inclusive trips.
- Over three quarters (78%) of respondents used a car or motorbike to reach their holiday destination; just under half (46%) went by airplane.
- Over 90% of respondents expressed satisfaction with the natural features and the quality of accommodation at their holiday location; but satisfaction was lower on the issues of the welcome shown to tourists, the general level of prices, and the activities on offer.

Travellers' profiles in 2011

- 72% of EU citizens spent at least one night travelling away from home either for business or private purposes in 2011, confirming the results in 2010 (72%), when a smaller sample was polled.
- A majority (54%) of people who went away on at least one overnight trip in 2011 stayed in paid accommodation, more than the 47% who stayed with friends or relatives.
- 60% of the people who stayed in paid accommodation did so for at least four nights.

Reasons for not going on holiday in 2011-2012

- 45% of EU respondents who did not go on holiday in 2011 did not do so for financial reasons – up slightly from the 43% of people who said this in the previous wave of the survey.
- Nearly three quarters (73%) of people in the EU are planning to go on holiday in 2012. Of these, 33% have changed their plans owing to the economic situation, while 40% say their original plans remain unchanged.
- The highest proportions of people planning to go away on holiday in 2012 were in Denmark (89%) and Finland (89%). The highest proportions of respondents saying they would not go away on holiday were in Turkey (45%), Portugal (40%) and Greece (35%).

Holidays planned for 2012

- 41% of respondents said that they planned to take a holiday of between four and 13 nights – more than the number of people planning longer or shorter trips.
- A majority (52%) of respondents plan to spend their holidays in their own country in 2012, while 37% intend to go on holiday in another EU country.
- 69% of people who said they holidayed in their own country in 2011 plan to do the same in 2012. 61% of those who holidayed in another EU country plan to do that again this year. And 54% of people who holidayed in a country outside the EU intend to do the same again in 2012.

1. RESEARCHING AND PLANNING A HOLIDAY

Respondents were asked a series of questions about the way in which they research and plan their holidays: first of all they were asked to give their main reasons for deciding to take a holiday, then to list the factors which they considered important in deciding to go back to a place where they had holidayed previously. Thirdly, respondents were asked to describe the sources of information they rely on when making decisions about their travel plans. And finally, they were asked to describe the methods they used to organize their holidays.

1.1   Reasons for going on holidays in 2011

- Half of the respondents who went on holiday for at least four nights say that rest/recreation was one of their main reasons for going -

Almost half (48%) of respondents say they went on holiday for rest/recreation (including wellness/health treatment), while just under a third (32%) took a holiday in order to spend time with their family. Over a quarter (28%) of respondents say they went on holiday for the sun or the beach, with the same proportion (28%) saying that they went to visit relatives or friends. For 18% of respondents, nature was a main reason for their holiday, a slightly higher proportion than went away for city trips (16%). Over one respondent in 10 (14%) took their holiday for cultural or religious reasons, with 10% going for sports-related purposes, such as scuba-diving or cycling.

Q6. What were your main reasons for going on holidays in 2011?

Reason	EU27
Rest/recreation (including Wellness/health treatment)	48%
Spending time with your family	32%
Sun/beach	28%
Visiting friends / relatives	28%
Nature (mountain, lake, landscape etc...)	18%
City trips	16%
Culture / religion	14%
Sports-related (e.g. scuba-diving, cycling etc...)	10%
Other (DO NOT READ OUT)	3%
Don't know	1%

● EU27

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

Rest/recreation was the reason for going on holiday cited by most respondents in all but seven of the 34 countries included in this survey. In 12 countries a majority of respondents say that rest/recreation was one of their main reasons for taking a holiday, with the highest proportions of people saying this occurring in Cyprus (70%), Greece (65%) and Hungary (61%). However, rest/recreation was a relatively uncommon reason for taking a holiday in Finland (12%), Turkey (22%) and Denmark (28%).

In Denmark and Finland, by contrast, **spending time with family** was the most popular reason for going on holiday (47% and 39% respectively). Relatively high numbers of people also cite this reason in Israel (42%), Norway (40%) and Portugal (39%). In other 10 countries, at least a third of respondents give 'spending time with family' as one of their three main reasons for going on holiday. This was least popular as a reason for taking a holiday in Cyprus, Italy and Latvia (all 21%).

For people in Norway (41%), **the sun or the beach** was the most common reason for going on holiday. Even more respondents in Portugal (47%) say that they went on holiday for this reason. Relatively few people took a holiday for this purpose in Malta (3%), Cyprus (8%) and Israel (11%).

Visiting family or friends was the main reason for holidaying in five countries: Estonia (49%), Latvia (46%, equal with rest/recreation), Turkey (41%), Sweden (39%) and Croatia (38%). This reason was least popular in Malta (16%), Slovenia (18%) and Macedonia (20%).

Going on holiday to see and enjoy **nature** was most common among respondents in the Czech Republic (32%), followed by those in Israel and the Netherlands (both 27%). But in Ireland and Cyprus only 6% and 7% of respondents respectively say that nature inspired them to go on holiday.

City trips were a relatively popular reason for going on holiday in Finland (26%), Lithuania (25%), Austria (23%), Latvia (21%) and Poland (21%), the only five countries where at least 20% of respondents give this reason. In comparison, it least 20% of respondents say that they went on holiday for **religion or culture** in four countries: Austria (26%), Belgium (22%), the Netherlands (22%) and Germany (21%). **Sports-related holidays** were most popular among respondents in Austria (18%), the Czech Republic (18%), and Finland (16%).

While detailed trend analysis is not possible here given that the terms of this question have changed significantly compared with previous waves, it is still possible to provide a general comparison.

In the 2011 survey, when respondents were only allowed to give one answer to this question (as opposed to multiple answers now), rest/recreation (36%) was again the most popular motivation for going on holiday. This was followed by sun/beach (18%), visiting friends/relatives (17%), city trips (8%), culture/religion (8%), nature (7%), sports-related (3%), and wellness/health treatment (3%).

Q6 What were your main reasons for going on holidays in 2011?

		Rest/recreation (including Wellness/health treatment)	Spending time with your family	Sun/beach	Visiting friends / relatives	Nature (mountain, lake, landscape etc…)	City trips	Culture / religion	Sports-related (e.g. scuba-diving, cycling etc…)
	EU27	48%	32%	28%	28%	18%	16%	14%	10%
	BE	**44%**	32%	23%	24%	22%	16%	22%	*13%*
	BG	**35%**	29%	27%	31%	18%	*4%*	5%	*4%*
	CZ	**55%**	36%	25%	24%	32%	*10%*	15%	18%
	DK	28%	**47%**	28%	25%	24%	17%	18%	*14%*
	DE	**52%**	26%	26%	25%	23%	18%	21%	*15%*
	EE	32%	33%	23%	**49%**	22%	*7%*	18%	*7%*
	IE	**47%**	34%	32%	30%	*6%*	12%	8%	10%
	EL	**65%**	30%	30%	30%	13%	9%	5%	5%
	ES	**43%**	30%	27%	31%	17%	16%	17%	5%
	FR	**45%**	38%	29%	36%	18%	19%	11%	10%
	IT	**51%**	21%	30%	22%	13%	19%	16%	*4%*
	CY	**70%**	21%	8%	27%	7%	4%	6%	5%
	LV	**46%**	21%	13%	**46%**	19%	21%	13%	*8%*
	LT	**39%**	25%	19%	31%	18%	25%	10%	*7%*
	LU	**42%**	35%	33%	26%	16%	16%	16%	*10%*
	HU	**61%**	32%	22%	26%	15%	18%	9%	*7%*
	MT	**59%**	25%	*3%*	16%	19%	12%	16%	*7%*
	NL	**45%**	36%	30%	26%	27%	16%	22%	*14%*
	AT	**44%**	26%	23%	26%	21%	23%	26%	18%
	PL	**52%**	37%	20%	28%	22%	21%	8%	*8%*
	PT	**56%**	39%	47%	31%	18%	*9%*	15%	*9%*
	RO	**53%**	32%	20%	32%	12%	9%	6%	*5%*
	SI	**49%**	36%	37%	18%	14%	19%	5%	10%
	SK	**49%**	28%	25%	26%	19%	11%	10%	*8%*
	FI	*12%*	**39%**	25%	35%	18%	26%	18%	16%
	SE	34%	38%	32%	**39%**	13%	*13%*	13%	*13%*
	UK	**45%**	38%	33%	28%	12%	11%	7%	8%
	HR	37%	30%	25%	**38%**	13%	*10%*	11%	*10%*
	TR	22%	25%	22%	**41%**	12%	11%	10%	*4%*
	MK	**56%**	25%	39%	20%	13%	*2%*	6%	6%
	IS	**49%**	27%	13%	33%	12%	18%	10%	*8%*
	NO	35%	40%	**41%**	29%	15%	19%	10%	*8%*
	RS	**59%**	24%	32%	26%	22%	4%	11%	*2%*
	IL	**44%**	42%	11%	21%	27%	12%	12%	*8%*

Highest percentage per country		*Lowest percentage per country*	
Highest percentage per item		Lowest percentage per item	

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

The socio-demographic data show that:

- Men and women generally cite very similar reasons for going on holiday, although women are slightly more inclined than men to take a holiday in order to spend time with their family (34% vs. 30%) and to visit friends and relatives (30% vs. 27%).

- Rest/recreation and spending time with the family are most popular among people aged 25-54 (49%-51%). Sun/ the beach (32%), visiting friends/relatives (36%), city trips (20%) and sport activities (12%) are common among the youngest respondents, from the 15-24 category. While nature (22%) and culture/religion (18%) are reasons for going on holiday for respondents aged 55+.

- Respondents who spent more time in education are the most likely to say they went on holiday in order to spend time with their family (33%) and for cultural/religious reasons (17%).

- People who live in large towns are more likely to say that they went on holiday to visit family or friends (31%) and for city trips (19%) than those who live in rural villages (26% and 14% respectively).

- Looking at the occupation scale, people who are not working are the most likely to say they go on holiday to visit friends or relatives and for cultural/religious reasons. Employees and self-employed choose spending time with the family, visiting friends/relatives and recreation as reasons for taking holidays.

Q6 What were your main reasons for going on holidays in 2011? (MAX. 3 ANSWERS)

	Rest/recreation (including Wellness/health treatment)	Spending time with your family	Sun/beach	Visiting friends / relatives	Nature (mountain, lake, landscape etc…)	City trips	Culture / religion	Sports-related (e.g. scuba-diving, cycling etc…)
EU27	48%	32%	28%	28%	18%	16%	14%	10%
Sex								
Male	47%	30%	27%	27%	18%	15%	13%	12%
Female	48%	34%	29%	30%	18%	17%	15%	7%
Age								
15-24	43%	27%	32%	36%	14%	20%	13%	12%
25-39	49%	39%	31%	31%	15%	14%	11%	10%
40-54	51%	39%	29%	24%	18%	15%	12%	11%
55 +	46%	24%	22%	27%	22%	17%	18%	7%
Education (End of)								
15-	50%	28%	28%	24%	15%	12%	10%	5%
16-19	47%	32%	28%	26%	17%	13%	10%	9%
20+	49%	33%	27%	29%	20%	18%	17%	11%
Still studying	42%	30%	31%	38%	13%	21%	17%	12%
Subjective urbanisation								
Rural village	49%	33%	28%	26%	19%	14%	14%	11%
Small/ Mid-size town	47%	32%	28%	29%	18%	16%	14%	9%
Large town	47%	32%	27%	31%	17%	19%	14%	9%
Respondent occupation scale								
Self-employed	48%	35%	27%	24%	17%	15%	12%	11%
Employee	51%	36%	30%	27%	19%	16%	13%	12%
Manual workers	49%	36%	31%	25%	14%	11%	8%	9%
Not working	44%	27%	25%	32%	18%	18%	16%	8%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

1.2 Respondents' motivation to choose the same place for holidays

- A location's natural features are the qualities most likely to persuade holiday-makers to go back there again -

Half (50%) of respondents say they would go back to a place for its natural features, such as the weather or the landscape, while a third (32%) say that the quality of the accommodation would persuade them to return. Around a quarter (27%) of respondents say that the general level of prices would be a reason for them to go back to the same place, while 24% say that an important factor for them is the way in which tourists are welcomed, in terms of child friendliness, customer care, and so on. Fewer than one in five (17%) say that the activities offered would make them go back to the same place for their holiday.

This question was not asked in earlier waves of the survey. Previously, respondents were asked what influenced their choice of destination, and in 2011 the main attractions were given as the environment (32%), cultural heritage (27%), and entertainment (14%).

Q10. Which of the following would make you go back to the same place for a holiday?

The natural features (weather conditions, landscape, etc.)	50%
The quality of the accommodation	32%
The general level of prices	27%
How tourists are welcomed (e.g. child friendliness, customer care, "pets-welcomed" policy, etc...)	24%
The activities offered (variety and comprehensiveness of the tourist offer)	17%
Other (DO NOT READ OUT)	8%
Don't know	10%

🌐 EU27

Base: Total number of respondents

Respondents in all 34 countries, with the sole exception of Israel, say that a place's **natural features**, such as the weather or the landscape, are the qualities most likely to make them return for another holiday. In 10 countries a majority of respondents cite a place's natural features, with the highest proportions of people giving this answer coming in the Czech Republic (65%), the Netherlands (58%), France (54%) and Portugal (54%). However, natural features are considered relatively unimportant in Macedonia (24%), Israel (33%), and Estonia (34%).

The quality of the accommodation is the joint top answer among UK respondents (48%, alongside natural features), followed by people in Ireland (43%), the Netherlands (41%) and Portugal (40%). At least a third of respondents in another 11 countries say that the quality of the accommodation is important in determining whether they would return to a particular holiday destination. But only 12% of respondents in Estonia say that this would make them want to go back to a particular place, as do 17% in Malta.

Among respondents in Israel (39%), **the general level of prices** matters most when deciding whether to return to a holiday destination. The same proportion of respondents (39%) think that prices might make them go back to a particular place in both Greece and Ireland. However, prices are seen as a less important factor in Macedonia (14%), Estonia (19%) and Slovakia (19%).

At least a quarter of respondents in 13 countries think that **the way in which tourists are welcomed** would influence their decision to return to the same place for another holiday. In Demark, 30% of respondents give this answer, as do 29% of those in Portugal. However, just 7% of people in Serbia and 12% of those in Estonia say that the way in which tourists are welcomed would influence their decision to return to the same place.

The range of **activities offered** is a particularly important factor for people in Iceland (39%), as well as for people in Finland (32%). In 13 countries, at least one respondent in five says that the activities would make them go back to the same place for another holiday. However, activities are relatively unimportant to respondents in Macedonia (7%), Hungary (8%) and Bulgaria (9%).

Q10 Which of the following would make you go back to the same place for a holiday?

	The natural features (weather conditions, landscape, etc.)	The quality of the accommodation	The general level of prices	How tourists are welcomed (e.g. child friendliness, customer care, "pets-welcomed" policy, etc...)	The activities offered (variety and comprehensiveness of the tourist offer)
EU27	50%	32%	27%	24%	17%
BE	**48%**	34%	25%	25%	*14%*
BG	**50%**	26%	30%	18%	*9%*
CZ	**65%**	36%	22%	26%	22%
DK	**44%**	33%	31%	30%	23%
DE	**52%**	36%	25%	23%	20%
EE	**34%**	*12%*	19%	12%	13%
IE	**45%**	43%	39%	28%	25%
EL	**49%**	31%	39%	17%	*12%*
ES	**50%**	35%	27%	20%	15%
FR	**54%**	23%	23%	27%	*16%*
IT	**49%**	20%	21%	22%	*10%*
CY	**40%**	25%	29%	15%	*12%*
LV	**36%**	24%	23%	23%	*20%*
LT	**49%**	24%	30%	17%	*12%*
LU	**45%**	36%	24%	25%	*13%*
HU	**46%**	28%	25%	21%	*8%*
MT	**53%**	*17%*	25%	23%	22%
NL	**58%**	41%	22%	19%	*17%*
AT	**48%**	36%	24%	28%	23%
PL	**53%**	29%	32%	27%	22%
PT	**54%**	40%	32%	29%	*15%*
RO	**42%**	32%	25%	21%	*12%*
SI	**44%**	33%	24%	28%	20%
SK	**50%**	33%	19%	19%	*15%*
FI	**36%**	31%	32%	23%	32%
SE	**44%**	33%	*25%*	25%	28%
UK	**48%**	**48%**	33%	28%	*19%*
HR	**42%**	29%	29%	*19%*	22%
TR	**40%**	30%	37%	19%	*13%*
MK	**24%**	20%	14%	19%	*7%*
IS	**43%**	*20%*	28%	25%	39%
NO	**44%**	37%	30%	*21%*	23%
RS	**42%**	31%	33%	7%	10%
IL	33%	31%	**39%**	23%	*17%*

Highest percentage per country	Lowest percentage per country
Highest percentage per item	Lowest percentage per item

Base: Total number of respondents

The socio-demographic data show that:

- The quality of the accommodation matters most to respondents in the 40-54 (36%) and 25-39 (35%) age brackets and least to those aged 55 and over (29%). The general level of prices also matters least to people aged 55 and over (20%).

- Respondents who spent more time in education are more likely to say that a place's natural features (55%) and the quality of accommodation (35%) might make them want to go back there for another holiday.

- Employees are the most likely to regard a place's natural features as a reason to go back there (55%). They are also the most likely to say that the quality of accommodation (38%) and the general level of prices (30%) are important factors.

Q10 Which of the following would make you go back to the same place for a holiday? (MAX. 3 ANSWERS)

	The natural features (weather conditions, landscape, etc.)	The quality of the accommodation	The general level of prices
EU27	50%	32%	27%
Sex			
Male	49%	33%	26%
Female	51%	32%	27%
Age			
15-24	49%	31%	31%
25-39	51%	35%	31%
40-54	51%	36%	28%
55 +	49%	29%	20%
Education (End of)			
15-	43%	27%	20%
16-19	49%	33%	27%
20+	55%	35%	28%
Still studying	49%	31%	31%
Subjective urbanisation			
Rural village	50%	33%	26%
Small/ Mid-size town	50%	32%	26%
Large town	51%	33%	28%
Respondent occupation scale			
Self-employed	50%	36%	27%
Employee	55%	38%	30%
Manual workers	48%	29%	29%
Not working	48%	29%	24%

Base: Total number of respondents

16

1.3 Sources of information most used when planning the holidays

- A majority of respondents consider the recommendations of friends, colleagues or relatives when making decisions about travel -

A majority (52%) of respondents say that the recommendations of friends, colleagues or relatives are important to them when making travel decisions, while four people in 10 (40%) say that internet websites are important in the decision-making process. Personal experience is cited as an important factor by a third (32%) of respondents.

Over one person in 10 says that travel/tourist agencies (16%) and free catalogues and brochures are important (11%). Less than one respondent in 10 says that the other factors like: newspapers, radio and TV (7%), paid-for guidebooks and magazines (7%) and social media sites (5%) are important when it comes to making decisions about travel plans.

It is not possible to make a direct comparison between these results and those of previous waves of the survey because the question has developed over time. However, in 2011, when respondents were asked to name the first and second most important information sources, the recommendations of friends and colleagues (58%) was again the most common answer, followed by the internet (45%), personal experience (29%), and travel/tourist agencies (21%).

Q12. From the following information sources, which one do you consider to be the most important when you make a decision about your travel plans?

Source	%
Recommendations of friends, colleagues or relatives	52%
Internet websites	40%
Personal experience	32%
Travel / tourist agencies	16%
Free catalogues, brochures	11%
Newspaper, radio, TV	7%
Paid for guidebooks and magazines	7%
Social media sites	5%
Other (DO NOT READ OUT)	2%
Don't know	4%
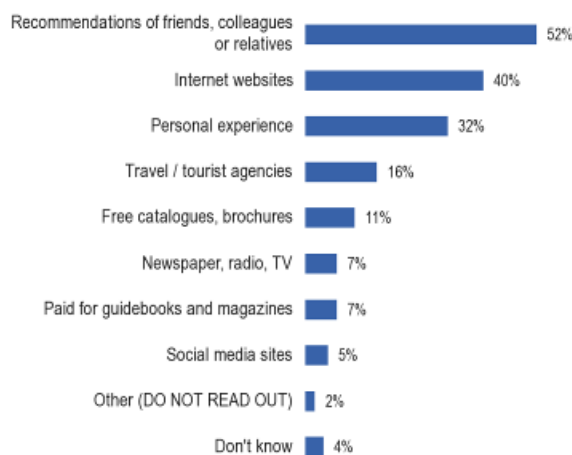
🌐 EU27

Base: Total number of respondents

Respondents in all but four of the 34 countries included in the survey think that **the recommendations of friends, colleagues or relatives** are the most important consideration when making travel plans. In 25 countries a majority of people say that this is an important consideration, with 66% of respondents in Latvia, 63% in Poland and 62% in Portugal expressing this opinion. However, only 32% of people in Macedonia say they consider the recommendations of friends, colleagues or relatives when making travel plans, followed by 35% in Italy and 39% in Malta.

In five countries, more people say they consult internet **websites** when making travel plans than say they consider other sources of information. They are: Finland (59%), the Netherlands (56%), Denmark (55%, equal with recommendations of friends, colleagues or relatives), Malta (42%) and Italy (40%). At least half of all respondents also give this answer in Estonia (51%), Iceland (51%) and Sweden (50%), though relatively few people do so in Serbia (7%), Macedonia (21%) and Romania (24%).

By contrast, in Serbia and Macedonia **personal experience** is the most popular source of information[1], with 45% and 32% of respondents respectively saying that they take personal experience into account when making decisions about their travel plans. In 23 countries at least three people in 10 say that personal experience is a factor in the decision-making process, though it plays a less of a role in terms of informing travel-related decisions among respondents in Turkey (22%) and Malta (25%).

A relatively large proportion of respondents say they take **travel/tourist agencies** into consideration when making their travel plans in Austria (27%), Spain (24%) and Luxembourg (23%). At least 20% of respondents mention travel/tourist agencies eight countries, though relatively few people do so in Hungary (5%) and Iceland (6%).

In 17 countries at least 10% of respondents say that they take **free catalogues or brochures** into account when it comes to making their travel plans, with the largest proportion of people doing so in Malta (19%) and the Netherlands (18%).

A noteworthy number of respondents consider **paid-for guidebooks and magazines** in Austria (11%), Portugal (11%), Germany (10%) and the Netherlands, while **newspapers, TV and radio** attract a similar level of consideration in Turkey (15%), Finland (13%), Lithuania (13%) and Portugal (13%).
While very few people generally use **social media** to inform their travel decisions, at least 10% of respondents do so in Cyprus (12%), Macedonia (11%) and Sweden (11%).

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[1] Equal in both cases to the number of people who say they consider the recommendations of friends, colleagues or relatives.

Q12 From the following information sources, which one do you consider to be the most important when you make a decision about your travel plans?

		Recommend ations of friends, colleagues or relatives	Internet websites	Personal experience	Travel / tourist agencies	Free catalogues, brochures	Paid for guidebooks and magazines	Newspaper, radio, TV	Social media sites
	EU27	52%	40%	32%	16%	11%	7%	7%	5%
	BE	**48%**	40%	27%	20%	17%	6%	5%	2%
	BG	**53%**	28%	32%	7%	3%	1%	10%	3%
	CZ	**61%**	49%	44%	13%	15%	4%	8%	2%
	DK	**55%**	**55%**	30%	10%	13%	8%	11%	5%
	DE	**51%**	41%	33%	22%	14%	10%	8%	7%
	EE	**55%**	51%	27%	14%	3%	2%	7%	6%
	IE	**59%**	42%	33%	8%	8%	7%	11%	4%
	EL	**51%**	37%	33%	13%	6%	4%	10%	8%
	ES	**54%**	38%	29%	24%	6%	5%	5%	5%
	FR	**55%**	41%	26%	12%	11%	9%	8%	2%
	IT	35%	**40%**	26%	22%	8%	4%	3%	3%
	CY	**40%**	33%	29%	20%	11%	5%	7%	12%
	LV	**66%**	44%	31%	10%	12%	5%	10%	5%
	LT	**61%**	36%	26%	9%	6%	1%	13%	3%
	LU	**43%**	38%	30%	23%	16%	6%	5%	3%
	HU	**52%**	36%	35%	5%	9%	5%	7%	3%
	MT	39%	**42%**	25%	18%	19%	6%	12%	4%
	NL	48%	**56%**	30%	14%	18%	10%	6%	8%
	AT	**54%**	42%	30%	27%	16%	11%	7%	5%
	PL	**63%**	41%	36%	7%	9%	5%	7%	4%
	PT	**62%**	32%	32%	22%	10%	11%	13%	6%
	RO	**51%**	24%	28%	16%	5%	4%	9%	5%
	SI	**56%**	26%	42%	17%	15%	5%	7%	5%
	SK	**55%**	40%	37%	14%	11%	3%	7%	2%
	FI	48%	**59%**	35%	8%	13%	6%	13%	7%
	SE	**60%**	50%	33%	10%	10%	9%	12%	11%
	UK	**55%**	39%	37%	10%	13%	7%	5%	4%
	HR	**61%**	33%	41%	11%	7%	3%	9%	2%
	TR	**53%**	30%	22%	9%	8%	3%	15%	5%
	MK	**32%**	21%	**32%**	12%	3%	2%	9%	11%
	IS	**56%**	51%	41%	6%	13%	6%	6%	4%
	NO	**55%**	49%	40%	7%	9%	8%	6%	7%
	RS	**45%**	7%	**45%**	15%	3%	2%	3%	1%
	IL	**51%**	38%	26%	13%	9%	8%	9%	4%

Highest percentage per country	*Lowest percentage per country*
Highest percentage per item	Lowest percentage per item

Base: Total number of respondents

According to the socio-demographic data:

- Men are more likely than women to rely on websites (43% vs. 37%) and on personal experience (33% vs. 30%) for their information, while women a more likely to consider the recommendations of friends, colleagues or relatives, by a margin of 54% to 50%.

- Respondents aged 15-39 (61-63%) are more likely than those aged 40-54 (53%) or 55 and over (40%) to consider the recommendations of friends, colleagues or relatives. People in the 25-39 group (53%) are the most likely to rely on websites, while those aged 55 and over (23%) are the least likely to do this.

- Respondents who left education aged 20 or over are more likely than those who left at a younger age to consider the recommendations of friends, colleagues or relatives, websites, and personal experience when making travel decisions.

- People who live in large towns are more likely to take into account the recommendations of friends, colleagues or relatives, websites, and personal experience when making their travel plans.

- Employees are more likely than respondents in other occupations, or those not working, to consider the recommendations of friends, colleagues or relatives, and also websites, when making their travel decisions.

Q12 From the following information sources, which one do you consider to be the most important when you make a decision about your travel plans? (MAX. 3 ANSWERS)

	Recommendations of friends, colleagues or relatives	Internet websites	Personal experience
EU27	52%	40%	32%
Sex			
Male	50%	43%	33%
Female	54%	37%	30%
Age			
15-24	61%	48%	32%
25-39	63%	53%	31%
40-54	53%	46%	34%
55 +	40%	23%	30%
Education (End of)			
15-	36%	17%	26%
16-19	51%	37%	32%
20+	57%	50%	34%
Still studying	63%	50%	32%
Subjective urbanisation			
Rural village	52%	38%	30%
Small/ Mid-size town	50%	41%	31%
Large town	54%	41%	34%
Respondent occupation scale			
Self-employed	53%	47%	34%
Employee	59%	54%	33%
Manual workers	54%	39%	31%
Not working	47%	30%	30%

Base: Total number of respondents

1.4   How respondents organized their holidays in 2011

- A majority of respondents organized their holiday via the internet, which was by far the most popular method -

A majority (53%) of those who took a holiday lasting at least four nights say that they used the internet to make their arrangements – considerably more than those who used the other methods under discussion. Just under a quarter (23%) of respondents say that they made their plans through a travel agency, with a similar number (22%) saying that they arranged their holiday through someone they know. Under one person in five (18%) made their arrangements over the phone, while less than a tenth of respondents made their arrangements on-site (9%) or over the counter of a transport company (4%).

Q9. Did you arrange your holidays in 2011 using any of the following methods?
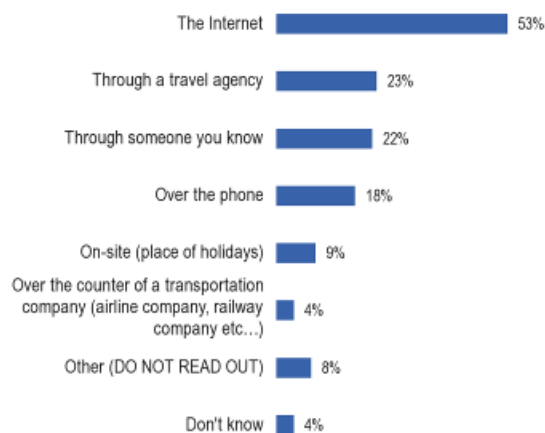
Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

In 28 of the 34 countries involved in this survey more people used **the internet** to make their holiday arrangements than those who used the other methods under consideration. In 16 countries a majority of people say they used the internet to organise their holiday, and at least seven out of 10 people did so in Norway (78%), Ireland (77%), the Netherlands (72%), Denmark (71%) and Finland (70%). However, far fewer people than average used the internet to make their arrangements in Macedonia (13%), Serbia (17%), Turkey (22%), and Lithuania (24%).

At least three out of 10 people say that they made their arrangements **through a travel agency** in six countries, with the most people giving this answer in Luxembourg (39%), Israel (37%) and Cyprus (36%). At least one person in 10 made their arrangements through a travel agency in all 34 countries, the lowest percentages being recorded in in Turkey (10%), Bulgaria (11%), Croatia (11%) and Iceland (11%).

In five countries more people made their arrangements **through someone they know** than used other methods: Serbia (35%), Slovakia (35%), Lithuania (31%), Croatia (28%) and Turkey (26%). In Latvia, four people in 10 (40%) made their holiday arrangements in this way. In all 34 countries at least one person in 10 made their arrangements through someone they know, with fewest people in the Netherlands (12%), Cyprus (13%), and Spain (14%).

More than 20% of respondents made their holiday arrangements **over the phone** in eight countries, with the highest numbers of people using this method occurring in Finland (30%), the UK (29%) and Poland (24%). But only 3% of respondents in Malta made their arrangements over the phone, as did 9% of those in Estonia.

Making holiday arrangements **on-site** is the most popular approach among respondents in Macedonia, with 27% of people there saying that they organised their holiday in this way. Relatively high numbers of respondents also made their arrangements on-site in Lithuania (21%) and Portugal (19%). While generally very few people made their arrangements **over the counter of transportation company**, over one person in 10 did so in Croatia (15%) and Finland (10%).

Q9 Did you arrange your holidays in 2011 using any of the following methods?

	The Internet	Through a travel agency	Through someone you know	Over the phone	On-site (place of holidays)	Over the counter of a transportation company (airline company, railway company etc…)
EU27	53%	23%	22%	18%	9%	4%
BE	**57%**	32%	19%	11%	12%	5%
BG	**30%**	11%	23%	16%	12%	4%
CZ	**40%**	29%	33%	17%	15%	5%
DK	**71%**	22%	15%	14%	6%	5%
DE	**54%**	28%	19%	20%	10%	4%
EE	**34%**	25%	30%	9%	17%	8%
IE	**77%**	22%	18%	18%	6%	4%
EL	**41%**	12%	20%	16%	15%	4%
ES	**52%**	25%	14%	11%	5%	2%
FR	**50%**	17%	27%	14%	11%	5%
IT	**48%**	21%	18%	10%	7%	2%
CY	**45%**	36%	13%	12%	3%	0%
LV	**52%**	18%	40%	16%	16%	5%
LT	24%	14%	**31%**	18%	21%	3%
LU	**54%**	39%	15%	12%	6%	8%
HU	**36%**	12%	23%	11%	3%	3%
MT	**61%**	27%	16%	3%	2%	5%
NL	**72%**	22%	12%	12%	14%	2%
AT	**51%**	34%	22%	17%	9%	2%
PL	**41%**	14%	29%	24%	10%	4%
PT	**43%**	24%	34%	22%	19%	5%
RO	**26%**	20%	25%	16%	13%	1%
SI	**35%**	33%	25%	14%	12%	2%
SK	32%	23%	**35%**	12%	10%	3%
FI	**70%**	20%	23%	30%	9%	10%
SE	**64%**	21%	25%	20%	9%	5%
UK	**68%**	28%	21%	29%	8%	9%
HR	26%	11%	**28%**	22%	7%	15%
TR	22%	10%	**26%**	21%	12%	4%
MK	13%	23%	23%	19%	**27%**	3%
IS	**58%**	11%	20%	11%	10%	5%
NO	**78%**	14%	24%	17%	5%	4%
RS	17%	29%	**35%**	11%	15%	0%
IL	**42%**	37%	22%	21%	9%	6%

Highest percentage per country	*Lowest percentage per country*
Highest percentage per item	Lowest percentage per item

Base: 60% from the total number of respondents (15 848 respondents)

(Those who went on holiday for at least four nights in 2011)

The socio-demographic data show that:

- Respondents in the 25-39 age group are the most likely to make holiday arrangements online: 65% do so, compared with 59% of 40-54 year-olds, 56% of 15-24 year-olds, and just 36% of people aged 55 and over. Respondents in the 15-24 age group are the most likely to make arrangements through someone they know (31% vs. 19-22% for the three other age bands).

- The higher the respondent's level of education, the greater the likelihood that he or she made holiday arrangements via the internet: 60% of people who left education aged 20 or over did this, compared with 50% who left aged 16-19, and just 27% who left aged 15 or under. Those who left school aged 15c or under are the most likely to use a travel agency (29% vs. 23% for the other two groups).

- Employees (64%) and self-employed respondents (63%) are more likely to organise their holidays online than manual workers (51%) or people who are not working (40%). Manual workers and people who are not working are more likely to make their arrangement through someone they know.

Q9 Did you arrange your holidays in 2011 using any of the following methods?
(MULTIPLE ANSWER POSSIBLE)

	The Internet	Through a travel agency	Through someone you know
EU27	53%	23%	22%
Sex			
Male	54%	22%	21%
Female	51%	24%	22%
Age			
15-24	56%	19%	31%
25-39	65%	19%	22%
40-54	59%	23%	19%
55 +	36%	29%	19%
Education (End of)			
15-	27%	29%	20%
16-19	50%	23%	21%
20+	60%	23%	20%
Still studying	54%	20%	34%
Subjective urbanisation			
Rural village	52%	24%	21%
Small/ Mid-size town	52%	23%	22%
Large town	54%	22%	22%
Respondent occupation scale			
Self-employed	63%	24%	17%
Employee	64%	22%	20%
Manual workers	51%	20%	23%
Not working	40%	24%	24%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

2. THE HOLIDAY EXPERIENCE

Respondents who went on a holiday that last at least four nights during 2011 were asked four questions about their experience: where they went, what kind of holiday it was (whether it was a package holiday, for example), the modes of transport which they used to reach their holiday destination and the level of satisfaction with certain aspects of their holiday.

2.1   Destinations for the main holidays taken in 2011

- A majority of respondents who went on holiday in 2011 stayed in their own country –

A majority (56%) of respondents say that they holidayed in their own country, while over four out of 10 (44%) say that they went to another EU country. Just under a quarter (22%) of respondents say they holidayed in another country outside the EU.

It is interesting to note the variation between EU15 and NMS12 responses on this question. While 62% of NMS12 respondents say that they spent their holiday in their own country, only 55% of EU15 respondents say the same thing.

Q5. In which country(ies) did you go for a minimum of 4 nights in 2011?
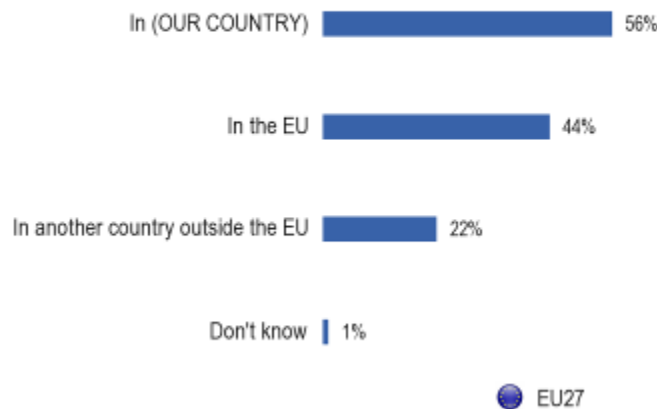
In (OUR COUNTRY)   56%

In the EU   44%

In another country outside the EU   22%

Don't know   1%

● EU27

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)
When asking the question (OUR COUNTRY) is replaced by the name of the country the interview is conducted

Interpreting these results slightly differently by combining the 'in our country' responses with the 'in the EU' responses, we find that 89% of EU respondents who went on holiday for at least four nights went somewhere within the EU, whether in their own country or in another Member State.

Some respondents, in answer to this question, named the specific countries that they visited (as opposed to, or as well as, giving a more general answer like 'in my country' or 'in the EU'). Over a tenth of EU respondents (11%) who went on holiday said they visited Spain. This is followed by Italy (9%), France (8%), Germany (5%), Austria (5%), and Greece (4%).

Q5. In which country(ies) did you go for a minimum of 4 nights in 2011?
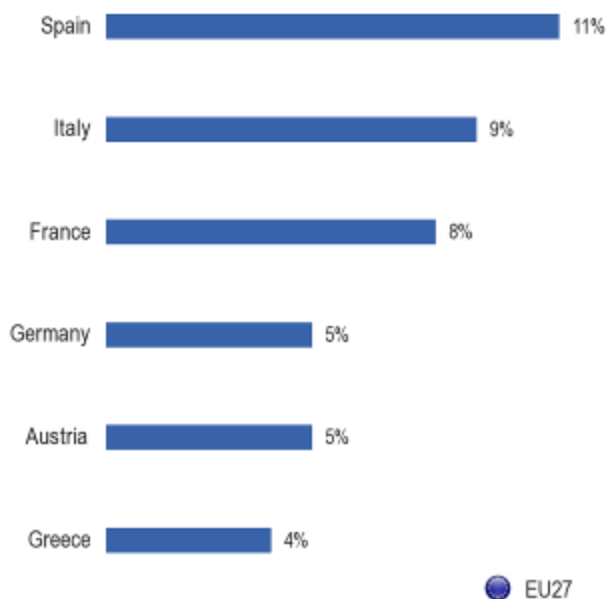
Spain	11%
Italy	9%
France	8%
Germany	5%
Austria	5%
Greece	4%

● EU27

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

However, when 'in our country' responses are discounted, the results look somewhat different. Now, the most visited countries are Spain (17%), Italy (17%), France (16%), Germany (13%) and the UK (10%).

At individual country level, a majority of respondents say that they went on holiday **in their own country** in 18 of the 34 countries being covered by this survey. Holidaying domestically was most popular in Turkey, where 91% of people stayed in their own country for their holiday, followed by Greece (80%), Bulgaria (77%), Italy (74%) and Croatia (73%). Domestic holidays were least common in Luxembourg (2%) and Malta (5%).

EL	80%	
BG	77%	
IT	74%	
ES	69%	
PL	67%	
FR	65%	
HU	64%	
RO	63%	
PT	59%	
FI	58%	
SK	58%	
SE	57%	
EU	56%	
EE	56%	
LT	55%	
CZ	54%	
AT	46%	
UK	46%	
DE	45%	
CY	44%	
LV	44%	
DK	42%	
SI	33%	
IE	33%	
NL	32%	
BE	15%	
MT	5%	
LU	2%	
TR	91%	
HR	73%	
IS	63%	
MK	42%	
RS	43%	
NO	42%	
IL	33%	

Question: Q5. In which country(ies) did you go for a minimum of 4 nights in 2011?

Answers: In (OUR COUNTRY)

Map Legend
- 60% - 100%
- 53% - 59%
- 0% - 52%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

'In the EU' was the most popular answer in 14 countries, while a majority of respondents in 16 countries say that they holidayed for at least four nights in the EU. Holidays in the EU were most popular in Luxembourg (93%), Malta (91%), Belgium (76%), and Cyprus (73%). But relatively few respondents went for a holiday in the EU in Turkey (6%), Bulgaria (23%), Greece (27%) and Italy (27%).

LU	93%	
MT	91%	
BE	76%	
CY	73%	
IE	71%	
NL	69%	
DK	66%	
AT	62%	
DE	60%	
EE	59%	
LV	58%	
SE	53%	
FI	52%	
SK	49%	
LT	48%	
UK	48%	
CZ	47%	
EU	44%	
RO	38%	
PL	36%	
SI	36%	
PT	35%	
HU	32%	
FR	30%	
ES	28%	
EL	27%	
IT	27%	
BG	23%	
IS	55%	
MK	41%	
HR	29%	
TR	6%	
NO	64%	
IL	52%	
RS	38%	

Question: Q5. In which country(ies) did you go for a minimum of 4 nights in 2011?

Answers: In the EU
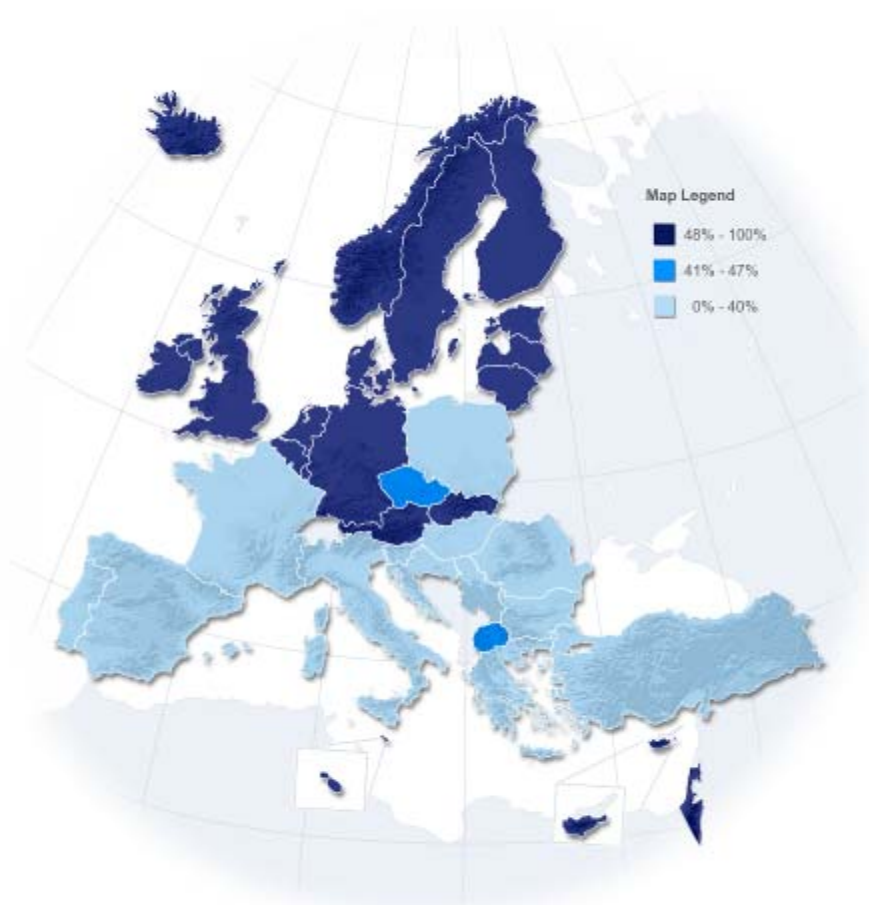
Map Legend
48% - 100%
41% - 47%
0% - 40%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

Holidaying **in another country outside the EU** was the most popular option in two countries: Slovenia, where 69% of people who went away for at least four nights did this, and in Serbia, where 44% did so. Travelling to a non-EU country was also relatively popular in Austria, Denmark and Macedonia (all 35%). However, relatively few individuals took holidays outside the EU in Greece (7%), Romania (8%), Bulgaria (9%) and Turkey (9%).

SI	69%	
AT	35%	
DK	35%	
UK	32%	
BE	31%	
NL	30%	
EE	29%	
DE	29%	
SE	28%	
CZ	28%	
LU	25%	
FI	24%	
LT	23%	
EU	22%	
FR	21%	
IE	21%	
SK	15%	
PT	15%	
HU	15%	
MT	15%	
LV	15%	
IT	14%	
PL	13%	
ES	12%	
CY	10%	
BG	9%	
RO	8%	
EL	7%	
MK	35%	
IS	29%	
HR	21%	
TR	9%	
RS	44%	
NO	28%	
IL	19%	

Question: Q5. In which country(ies) did you go for a minimum of 4 nights in 2011?

Answers: In another country outside the EU
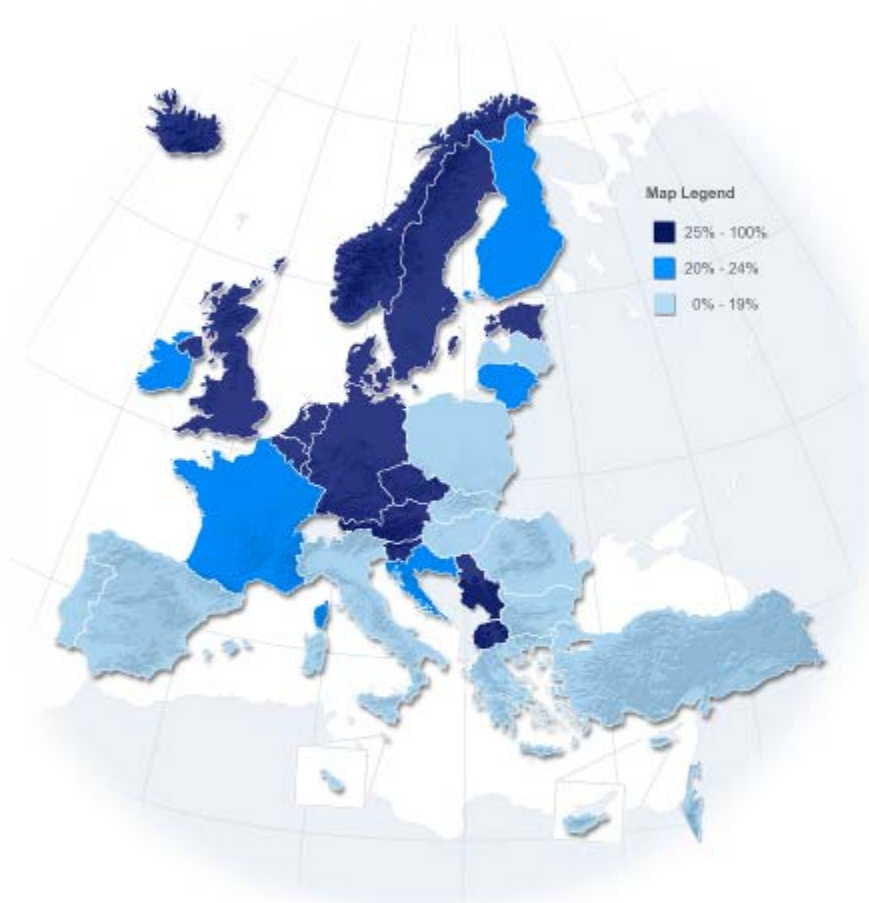
Map Legend
- 25% - 100%
- 20% - 24%
- 0% - 19%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

Focusing on the specific places that people from individual countries chose to visit, we find that in 14 countries at least 10% of respondents say that they went to **Spain** for their holiday. Spain was the most popular as a holiday destination among people in Ireland (31%), Norway (21%), Portugal (20%) and the UK (20%).

In 11 countries, at least 10% of people went to **Italy** for their holiday and it was most visited by respondents from Malta (37%), Austria (26%), Germany (18%) and Luxembourg (18%).

At least one in 10 respondents went to **France** for their holiday in nine countries. France was the most-visited destination by respondents in Belgium (40%), Luxembourg (27%) and the Netherlands (22%).

Germany (14%) is the only country where more than 10% of respondents say that they visited **Austria** for their holiday, though 9% of people in Luxembourg and 8% of those in the Netherlands also did so. But as a destination, **Germany** was visited by at least 10% of people in eight countries, mostly by tourists from Luxembourg (20%), Latvia (17%) and the Netherlands (17%).

At least one in 10 respondents went to **Greece** for their holiday in four countries: Cyprus (50%), Macedonia (20%), Serbia (16%), and Bulgaria (10%).

Destinations for the main holidays taken in 2011

BE
- In the EU — 76%
- In another country outside the EU — 31%
- In (OUR COUNTRY) — 15%

BG
- In (OUR COUNTRY) — 77%
- In the EU — 23%
- In another country outside the EU — 9%

CZ
- In (OUR COUNTRY) — 54%
- In the EU — 47%
- In another country outside the EU — 28%

DK
- In the EU — 66%
- In (OUR COUNTRY) — 42%
- In another country outside the EU — 35%

DE
- In the EU — 60%
- In (OUR COUNTRY) — 45%
- In another country outside the EU — 29%

EE
- In the EU — 59%
- In (OUR COUNTRY) — 56%
- In another country outside the EU — 29%

IE
- In the EU — 71%
- In (OUR COUNTRY) — 33%
- In another country outside the EU — 21%

EL
- In (OUR COUNTRY) — 80%
- In the EU — 27%
- In another country outside the EU — 7%

ES
- In (OUR COUNTRY) — 69%
- In the EU — 28%
- In another country outside the EU — 12%

FR
- In (OUR COUNTRY) — 65%
- In the EU — 30%
- In another country outside the EU — 21%

IT
- In (OUR COUNTRY) — 74%
- In the EU — 27%
- In another country outside the EU — 14%

CY
- In the EU — 73%
- In (OUR COUNTRY) — 44%
- In another country outside the EU — 10%

LV
- In the EU — 58%
- In (OUR COUNTRY) — 44%
- In another country outside the EU — 15%

LT
- In (OUR COUNTRY) — 55%
- In the EU — 48%
- In another country outside the EU — 23%

LU
- In the EU — 93%
- In another country outside the EU — 25%
- In (OUR COUNTRY) — 2%

HU
- In (OUR COUNTRY) — 64%
- In the EU — 32%
- In another country outside the EU — 15%

MT
- In the EU — 91%
- In another country outside the EU — 15%
- In (OUR COUNTRY) — 5%

NL
- In the EU — 69%
- In (OUR COUNTRY) — 32%
- In another country outside the EU — 30%

AT
- In the EU — 62%
- In (OUR COUNTRY) — 46%
- In another country outside the EU — 35%

PL
- In (OUR COUNTRY) — 67%
- In the EU — 36%
- In another country outside the EU — 13%

PT
- In (OUR COUNTRY) — 59%
- In the EU — 35%
- In another country outside the EU — 15%

RO
- In (OUR COUNTRY) — 63%
- In the EU — 38%
- In another country outside the EU — 8%

SI
- In another country outside the EU — 69%
- In the EU — 36%
- In (OUR COUNTRY) — 33%

SK
- In (OUR COUNTRY) — 58%
- In the EU — 49%
- In another country outside the EU — 15%

FI
- In (OUR COUNTRY) — 58%
- In the EU — 52%
- In another country outside the EU — 24%

SE
- In (OUR COUNTRY) — 57%
- In the EU — 53%
- In another country outside the EU — 28%

UK
- In the EU — 48%
- In (OUR COUNTRY) — 46%
- In another country outside the EU — 32%

HR
- In (OUR COUNTRY) — 73%
- In the EU — 29%
- In another country outside the EU — 21%

TR
- In (OUR COUNTRY) — 91%
- In another country outside the EU — 9%
- In the EU — 6%

MK
- In (OUR COUNTRY) — 42%
- In the EU — 41%
- In another country outside the EU — 35%

IS
- In (OUR COUNTRY) — 63%
- In the EU — 55%
- In another country outside the EU — 29%

NO
- In the EU — 64%
- In (OUR COUNTRY) — 42%
- In another country outside the EU — 28%

RS
- In another country outside the EU — 44%
- In (OUR COUNTRY) — 43%
- In the EU — 38%

IL
- In the EU — 52%
- In (OUR COUNTRY) — 33%
- In another country outside the EU — 19%

Q5 In which country(ies) did you go for a minimum of 4 nights in 2011? - Top 6 destinations

	Spain	Italy	France	Austria	Germany	Greece
EU27	11%	9%	8%	5%	5%	4%
BE	16%	13%	**40%**	5%	8%	5%
BG	2%	1%	3%	1%	3%	**10%**
CZ	3%	**12%**	5%	6%	8%	7%
DK	**16%**	14%	10%	6%	**16%**	5%
DE	14%	**18%**	8%	14%	0%	4%
EE	**7%**	3%	6%	4%	**7%**	3%
IE	**31%**	9%	13%	2%	3%	3%
EL	3%	3%	3%	2%	**6%**	0%
ES	0%	7%	**8%**	1%	3%	2%
FR	**12%**	8%	0%	1%	3%	2%
IT	**9%**	0%	7%	2%	3%	3%
CY	3%	5%	4%	2%	5%	**50%**
LV	5%	9%	4%	2%	**17%**	1%
LT	5%	6%	6%	1%	**9%**	3%
LU	12%	18%	**27%**	9%	20%	4%
HU	2%	6%	1%	7%	**8%**	4%
MT	12%	**37%**	11%	3%	12%	3%
NL	15%	14%	**22%**	8%	17%	4%
AT	9%	**26%**	7%	0%	16%	6%
PL	3%	5%	3%	3%	**11%**	3%
PT	**20%**	4%	11%	0%	3%	0%
RO	5%	**10%**	3%	5%	9%	5%
SI	4%	**11%**	5%	7%	6%	5%
SK	4%	**9%**	3%	7%	4%	4%
FI	**13%**	7%	4%	3%	8%	6%
SE	**15%**	10%	8%	3%	8%	7%
UK	**20%**	5%	12%	1%	4%	5%
HR	3%	**9%**	3%	7%	5%	0%
TR	0%	1%	**2%**	1%	**2%**	1%
MK	0%	4%	2%	3%	6%	**20%**
IS	**18%**	3%	3%	1%	7%	2%
NO	**21%**	6%	6%	2%	5%	9%
RS	2%	3%	2%	3%	7%	**16%**
IL	9%	9%	10%	2%	**12%**	7%

Highest percentage per country	*Lowest percentage per country*
Highest percentage per item	Lowest percentage per item

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

The socio-demographic data show that:

- Older respondents are the most likely to say that they holidayed in their own country: 59% of over-55s say this, as opposed to 52% of people in the 15-24 age band. Respondents in the latter group are the most likely to have taken a holiday in the EU: 48% did so, compared with 42% of people aged 55 or more.

- Individuals with a lower level of education are the most likely to have gone on holiday in their own country: while 65% of people who left school aged 15 or under did this, only 58% of those who left aged 16-19, and 53% who left at 20 or over did the same. By contrast, respondents with a higher level of education are the most likely to have taken a holiday in the EU and/or in a country outside the EU.

- While 60% of people who are not working holidayed in their own country, only 47% of self-employed respondents did this. By contrast, a majority (53%) of self-employed people holidayed in the EU, compared with just 39% of manual workers and 41% of people who are not working.

Q5 In which country(ies) did you go for a minimum of 4 nights in 2011?
(DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

	In [OUR COUNTRY]	In another country outside the EU	In the EU
EU27	56%	22%	44%
Sex			
Male	54%	24%	44%
Female	58%	21%	43%
Age			
15-24	52%	21%	48%
25-39	56%	23%	43%
40-54	55%	24%	45%
55 +	59%	21%	42%
Education (End of)			
15-	65%	15%	31%
16-19	58%	21%	40%
20+	53%	25%	48%
Still studying	53%	21%	49%
Subjective urbanisation			
Rural village	54%	22%	44%
Small/ Mid-size town	58%	22%	43%
Large town	55%	24%	45%
Respondent occupation scale			
Self-employed	47%	29%	53%
Employee	54%	24%	46%
Manual workers	56%	21%	39%
Not working	60%	20%	41%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

2.2   Types of holidays taken in 2011

- Half of respondents went on a holiday where the components of their trip, such as transport and accommodation, were bought separately –

Almost half (49%) of all respondents say that they went on a holiday where the transportation and the accommodation were arranged separately. Just over a quarter (27%) of respondents went on an all-inclusive holiday, while just under a quarter (23%) went on a package tour.

While this exact question was not included in previous waves of the survey, respondents were asked a related question. In 2011, 57% of respondents said that their travel/accommodation was organised individually, again highlighting the fact that many people prefer to organise their holidays themselves.

Q8. In 2011, how many times did you go on any of the following types of holiday?   36
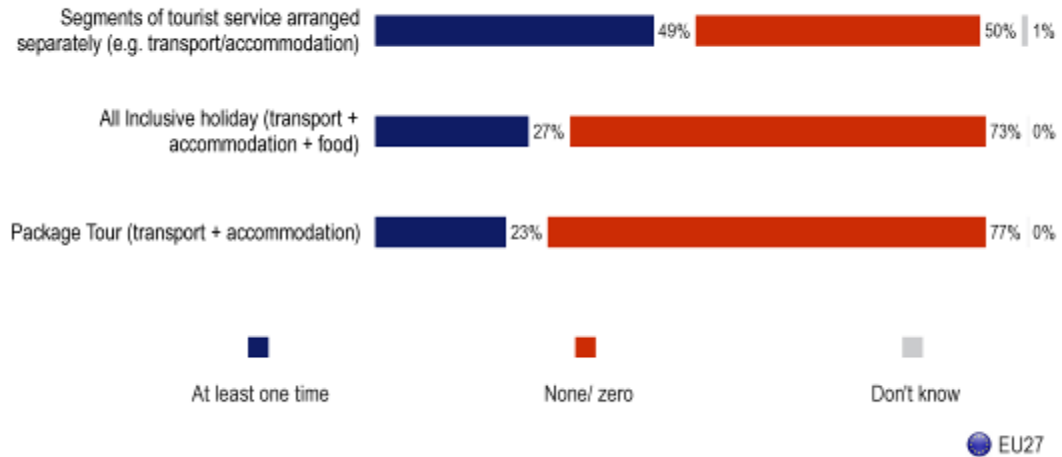
Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights)

At individual country level, at least 30% of respondents in eight countries say that they went on an **all-inclusive holiday** at least once in 2011. This type of holiday was most popular amongst respondents in Cyprus (40%), Malta (39%), Luxembourg (35%) and Serbia (35%). However, in both Croatia and Sweden only 17% of respondents who went on holiday in 2011 say that they opted for this kind of experience.
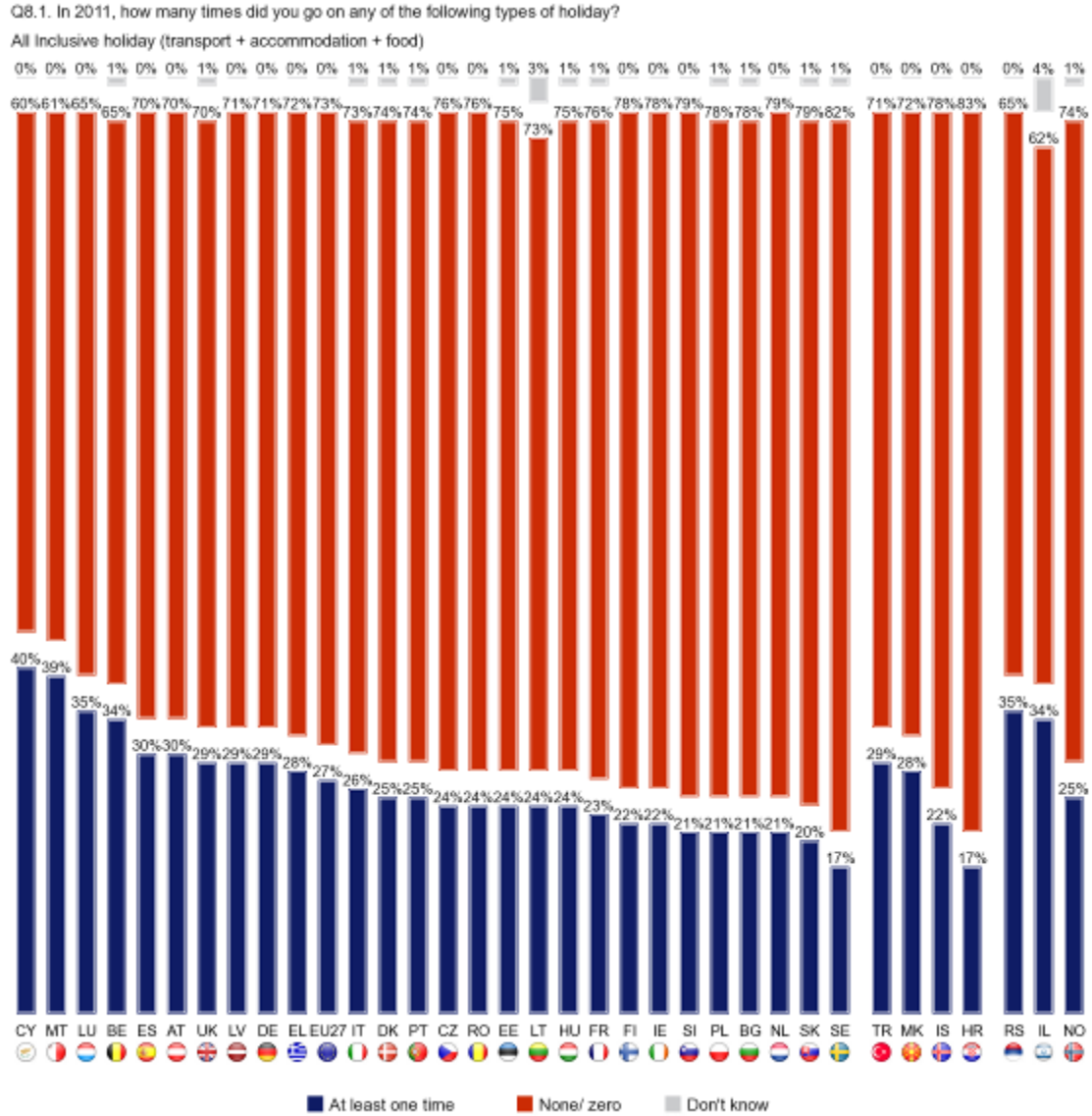
Q8.1. In 2011, how many times did you go on any of the following types of holiday?

All inclusive holiday (transport + accommodation + food)

Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

When it comes to package holiday, at least 30% of respondents in just six countries say that they went on this kind of holiday at least once in 2011. Package holiday was most popular amongst respondents in Austria (36%), Israel (36%), and Luxembourg (36%). But relatively few people in Turkey (10%), Greece (11%), Macedonia (11%) and Portugal (11%) chose to go on a package tour.
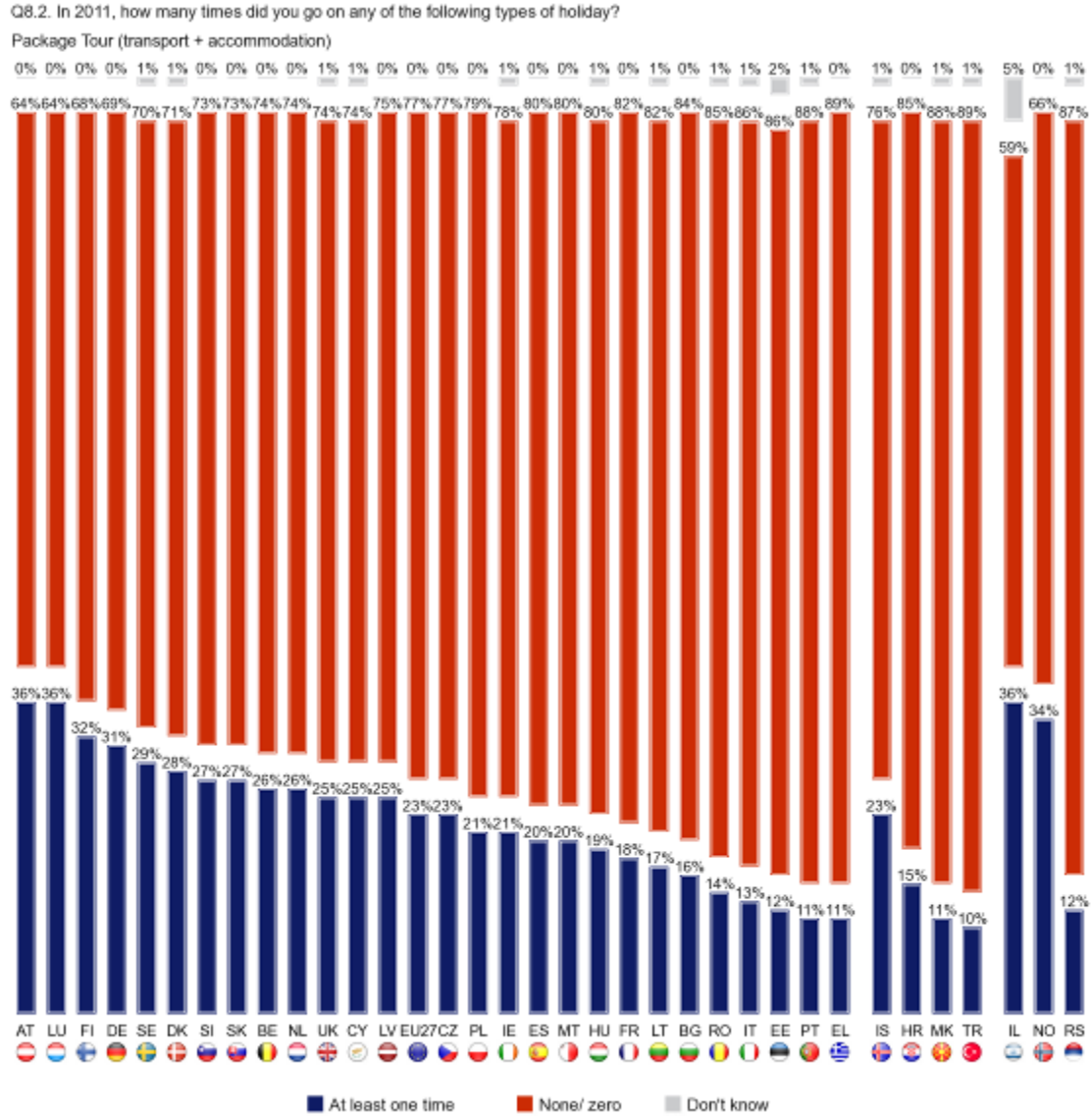
Q8.2. In 2011, how many times did you go on any of the following types of holiday?

Package Tour (transport + accommodation)

Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

A majority of people in 15 of the 34 countries covered by the survey say that they took a holiday in 2011 where **transportation and accommodation were booked separately.** This approach was particularly commonplace among holidaymakers in Ireland (69%), Denmark (65%), Germany (63%), and the Czech Republic (60%). This kind of holiday was least popular in Hungary (30%), Turkey (31%) and Estonia (32%).
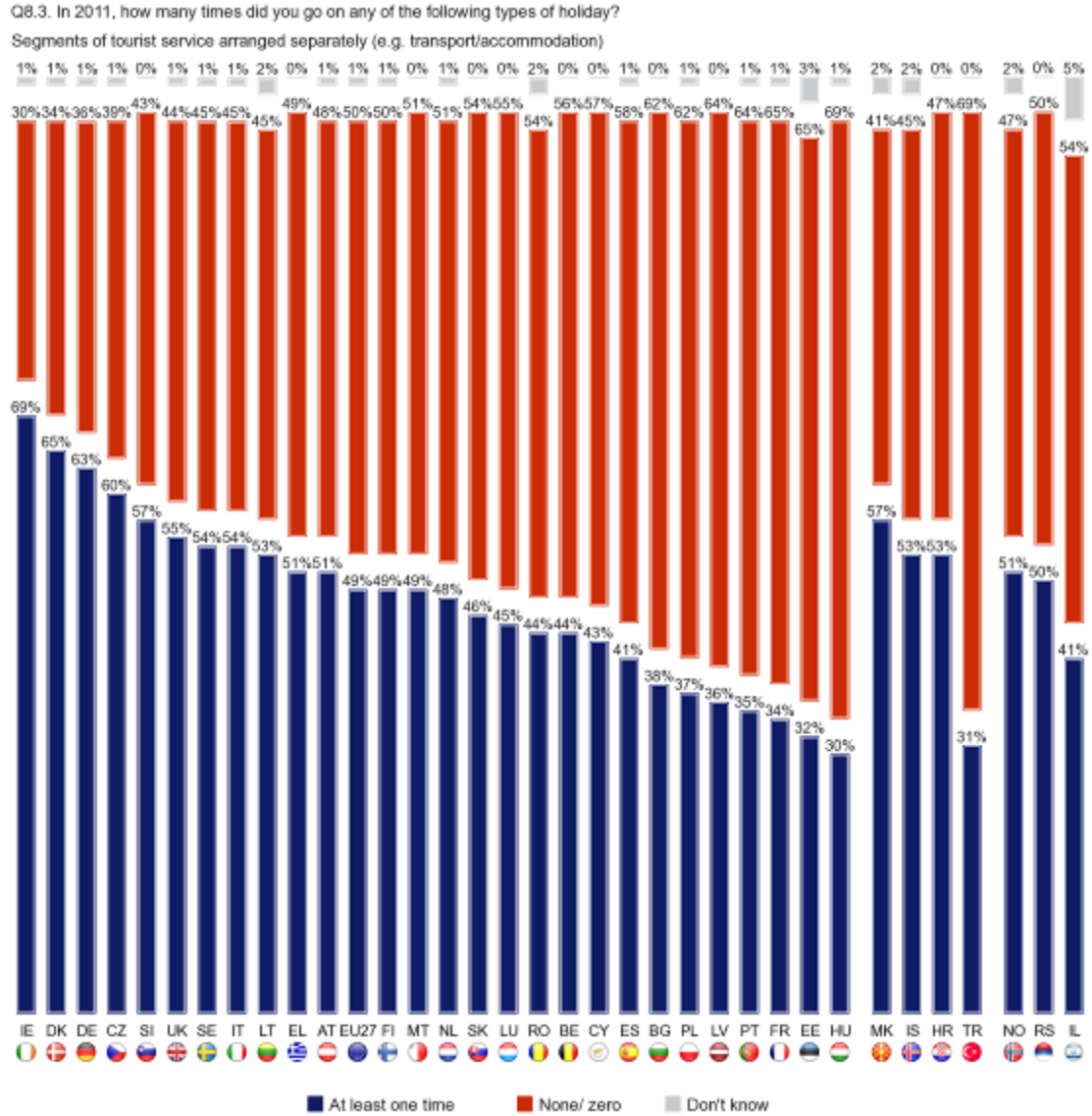
Q8.3. In 2011, how many times did you go on any of the following types of holiday?
Segments of tourist service arranged separately (e.g. transport/accommodation)

■ At least one time   ■ None/ zero   ▨ Don't know

Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

The socio-demographic data show that:

- Respondents in the 25-39 age group are the most likely to take a holiday where transport and accommodation are bought separately: 55% of people in this category took this type of holiday, compared with just 40% of over-55s. However, people aged 55 and over were the most likely to have taken a package tour (26% did so, compared with 19% of 25-39 year-olds). 15-24 year-olds and the over-55s were equally likely to have taken an all-inclusive holiday: 30% of people in these two groups did so, compared with just 21% of individuals in the 25-39 age bracket.

- While a majority (53%) of people who left education aged 20 or over took a holiday where transport and accommodation were bought separately, only 33% of people who left school at 15 or under did this. By contrast, people in the latter group are the most likely to have gone on an all-inclusive holiday.

- Respondents who live in towns are more likely to have taken a holiday where transport and accommodation are bought separately: 51% did so, as opposed to 46% of those who live in rural villages.

- While 57% of self-employed people and 55% of employees went on a holiday where transport and accommodation are bought separately, only 43% of people who are not working and 45% of manual workers did this.

Q8 In 2011, how many times did you go on any of the following types of holiday?

	All Inclusive holiday (transport + accommodation + food)		Package Tour (transport + accommodation bought together)		Holidays where transport and accommodation are bought separately	
	At least on time	None/ zero	At least on time	None/ zero	At least on time	None/ zero
EU27	27%	73%	23%	77%	49%	50%
Sex						
Male	27%	72%	23%	76%	50%	49%
Female	26%	74%	23%	77%	48%	51%
Age						
15-24	30%	69%	24%	75%	53%	46%
25-39	21%	79%	19%	81%	55%	44%
40-54	25%	75%	21%	79%	51%	48%
55 +	30%	70%	26%	73%	40%	59%
Education (End of)						
15-	32%	68%	23%	77%	33%	66%
16-19	26%	74%	24%	76%	48%	52%
20+	25%	75%	22%	78%	53%	46%
Still studying	26%	73%	23%	76%	55%	44%
Subjective urbanisation						
Rural village	28%	72%	24%	76%	46%	53%
Small/ Mid-size town	27%	73%	22%	77%	51%	48%
Large town	24%	76%	22%	78%	51%	48%
Respondent occupation scale						
Self-employed	27%	73%	20%	80%	57%	42%
Employee	25%	75%	22%	78%	55%	44%
Manual workers	25%	75%	21%	79%	45%	54%
Not working	28%	71%	24%	75%	43%	56%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

2.3   Means of transport used for going on holidays in 2011

- Over three quarters of respondents who took a holiday in 2011 used a car or motorbike at least once to reach their destination –

Over three quarters (78%) of respondents say that they travelled at least once by car or motorbike when journeying to their holiday destination, while just under half (46%) say that they went by airplane. Nearly three out of 10 (29%) people say that their journey included at least one train trip, with two out of 10 (20%) respondents having taken at least one bus journey on the way to their holiday destination. A further 14% of respondents say that they rode on at least one boat in order to reach their holiday destination.

The wording of this question has been slightly rephrased compared to last years' questionnaire; however it is possible to compare the results. In 2011, when only one answer was permitted, 44% of respondents said they travelled by car/motorbike, 39% travelled by airplane, 7% by train, 6% by bus, and 3% by boat.

Q7. How many times did you use the following means of transport to travel to your holiday destination in 2011…?
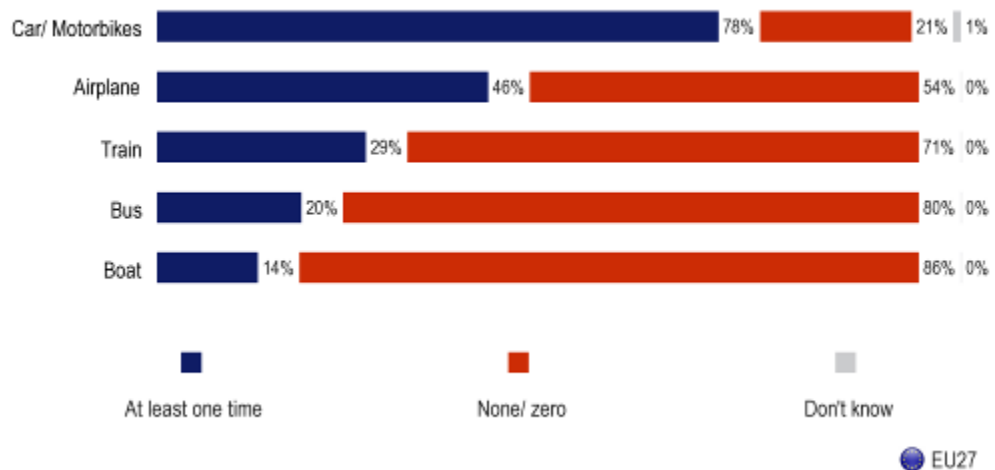
Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

It is interesting to note the difference between EU15 and NMS12 responses on the question of whether people travelled by airplane in order to reach their destination. While 50% of EU15 respondents took at least one plane journey, only 24% of NMS12 (respondents did so.

41

A majority of respondents in 16 of the 34 countries included in the survey travelled on at least one **airplane** in order to get to their holiday destination. In six countries, over seven out of 10 respondents who went on holiday in 2011 travelled by plane: Malta (93%), Ireland (81%), Cyprus (77%), Iceland (77%), Norway (77%), and Israel (71%). However, air travel was relatively unusual amongst holidaymakers in: Bulgaria (15%), Macedonia (16%), Serbia (16%), Hungary (17%) and Croatia (19%).
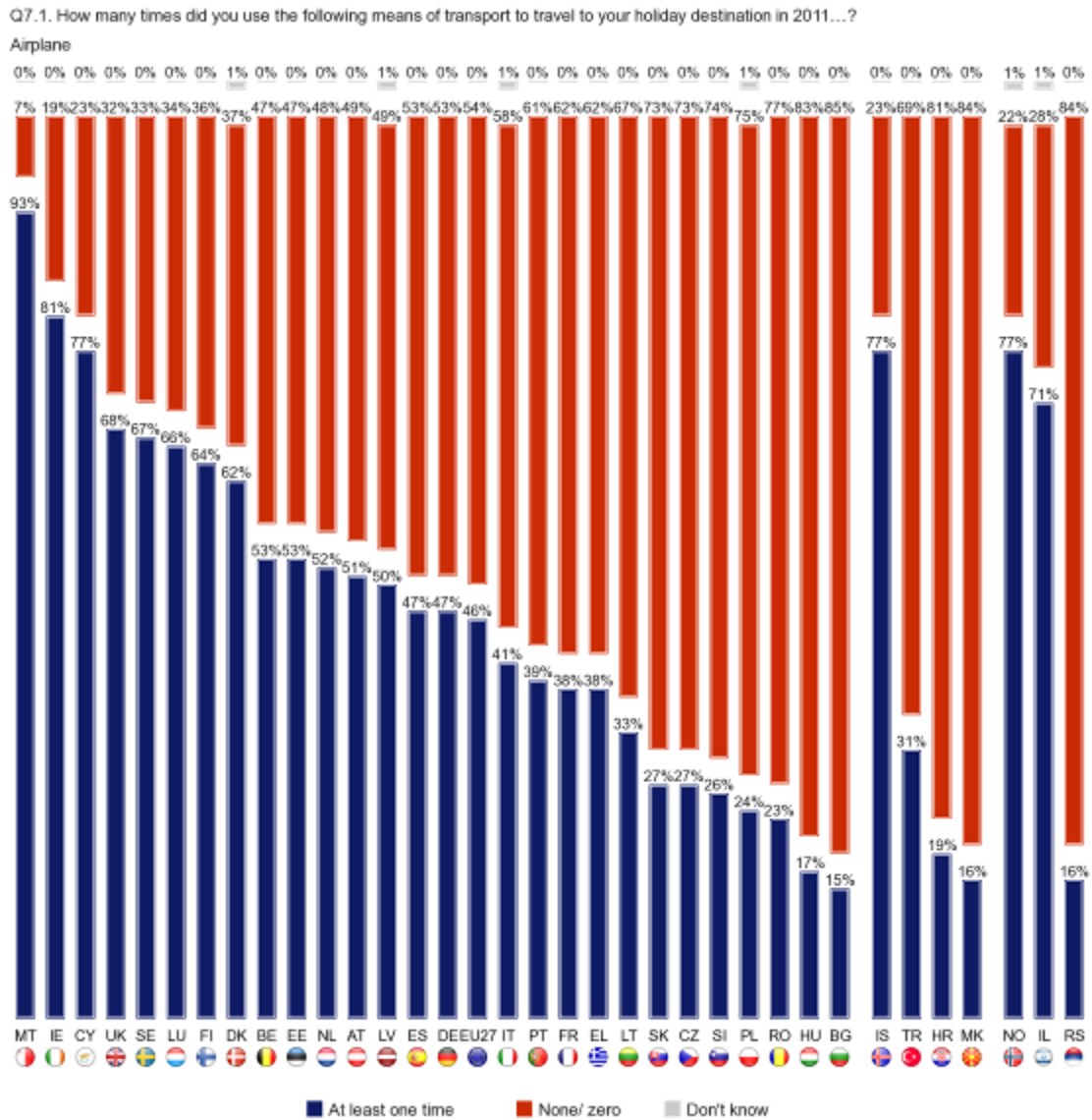
Q7.1. How many times did you use the following means of transport to travel to your holiday destination in 2011…?
Airplane

Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

While travelling by **boat** was relatively unusual in most countries, in seven countries at least three people in 10 say that they journey to their holiday destination involved one or more boat trip. They are: Estonia (48%), Finland (46%), Greece (40%), Norway (34%), Sweden (32%), and Croatia (30%). In 12 countries, less than 10% of holidaymakers used a boat to reach to their destination.

In six countries, at least three out of 10 people who took a holiday in 2011 travelled by **train** on one or more occasion in order to reach their holiday destination. They are: Finland (38%), France (36%), Sweden (33%), Romania (33%), the UK (32%), and Germany (30%). However, relatively few train journeys were taken by people in Cyprus (10%), Serbia (10%), Slovenia (10%), Greece (11%) and Macedonia (12%).
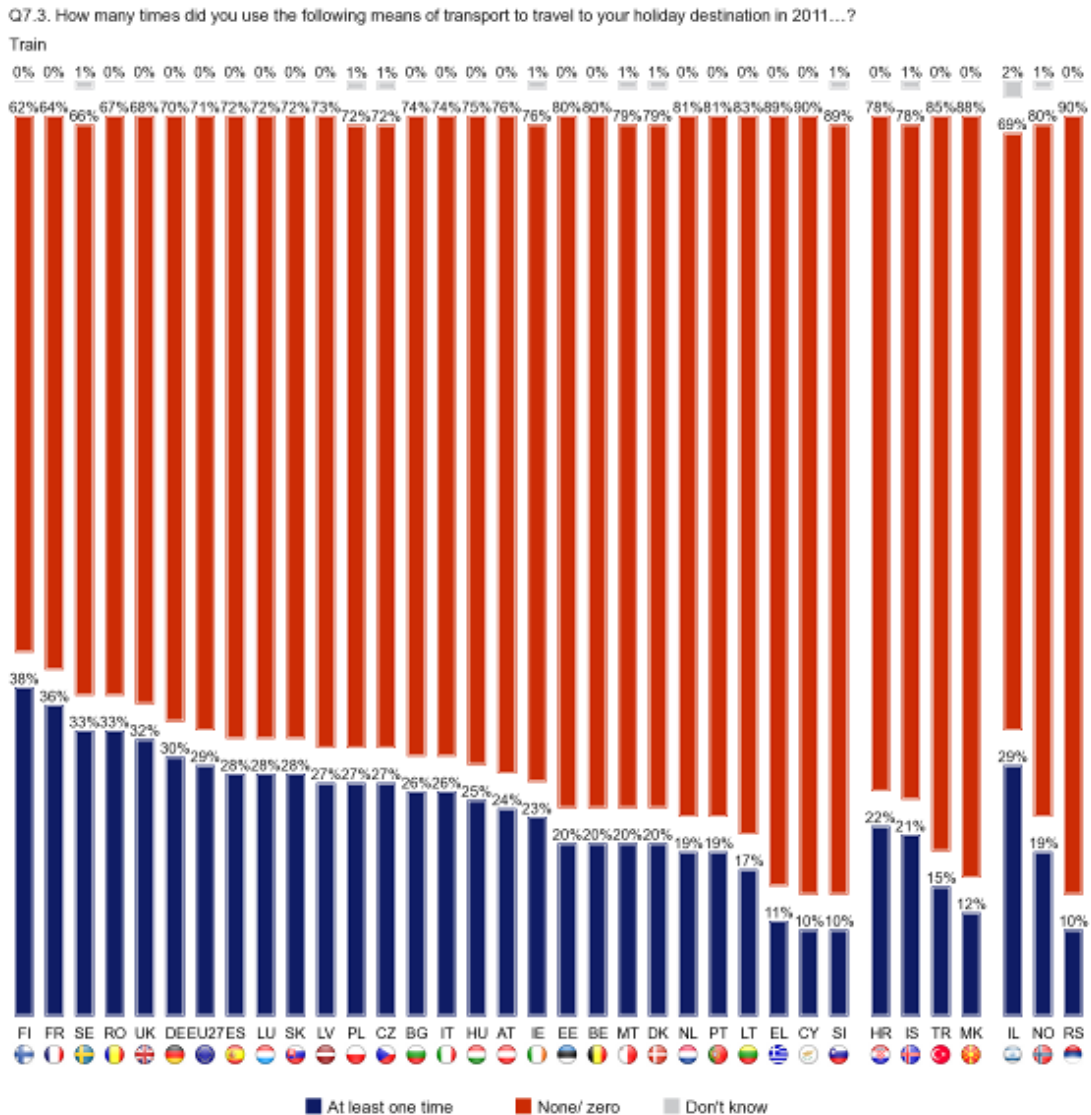
Q7.3. How many times did you use the following means of transport to travel to your holiday destination in 2011...?
Train

Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

In six countries, at least four out of 10 people who went on holiday in 2011 travelled by **bus** in order to reach their destination. They are: Turkey (64%), Macedonia (50%), Latvia (48%), Serbia (45%), Estonia (43%) and Bulgaria (42%). Bus travel was least important to holidaymakers in the Netherlands (9%), France (11%), Belgium (12%) and Italy (12%).

A majority of people who went on holiday in all but two countries – Cyprus and Malta – say that they travelled by **car or motorbike** at least once in order to reach their destination. In 12 countries at least eight out of 10 holidaymakers journeyed by car or motorbike, which were especially popular means of transport in Slovenia (92%), Croatia (87%), France (86%), Lithuania (86%), Iceland (85%) and Portugal (85%). These means of reaching a holiday destination were employed least in Malta (30%) and Cyprus (46%), followed by Turkey (62%), Israel (63%) and Serbia (63%).
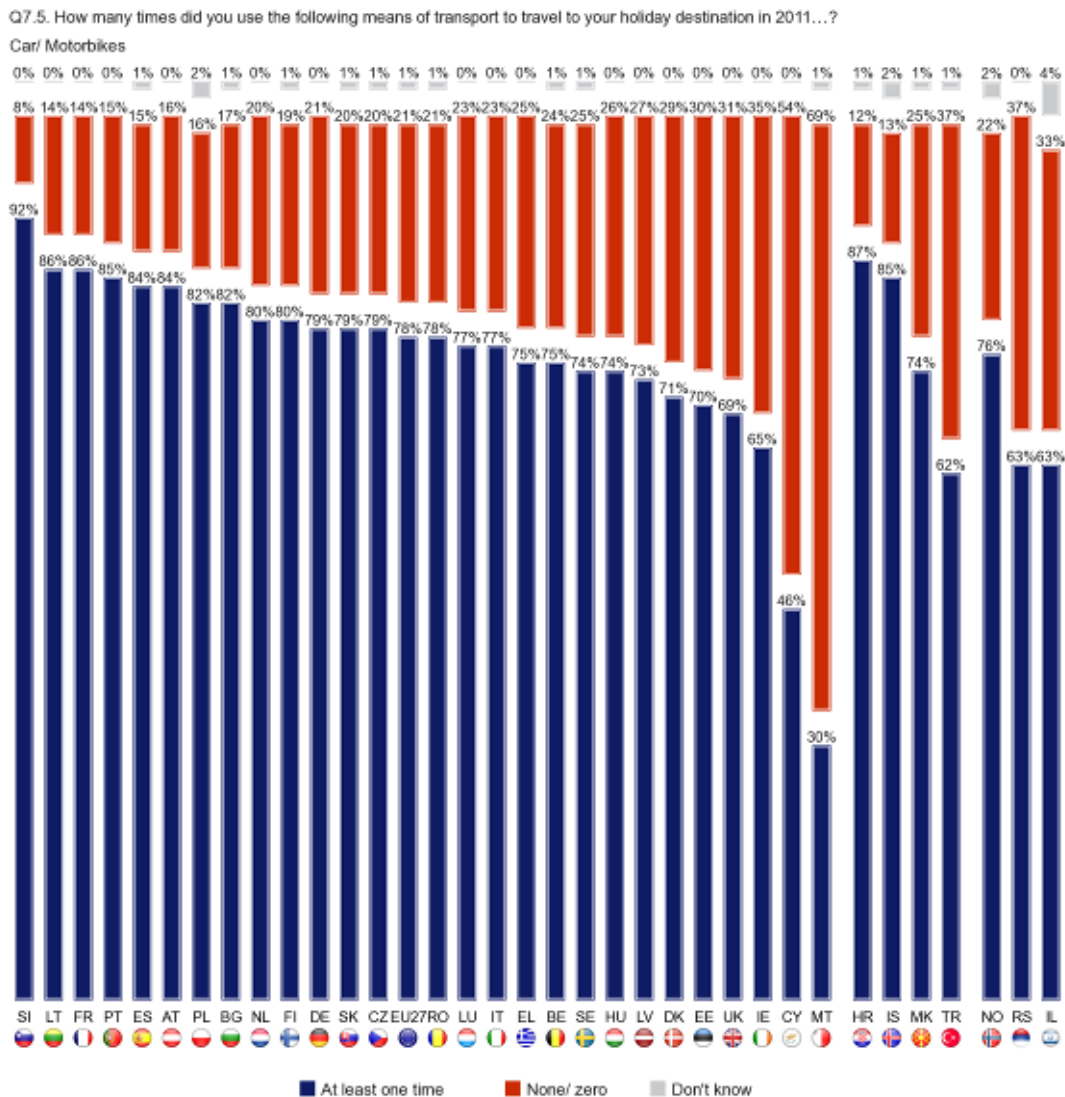
Q7.5. How many times did you use the following means of transport to travel to your holiday destination in 2011…?
Car/ Motorbikes

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

The socio-demographic data show that:

- People aged 25-54 (83-84%), individuals who finished their education aged 20 or over (81%) or aged 16-19 (79%), those who left education at 15 or under (68%) and respondents who live in rural villages (82%) are more likely to have travelled by car or motorbike when reaching their holiday destination. Employees (84%) and self-employed respondents (82%) are also more likely to have taken a car or motorbike than manual workers (76%) and people who are not working (73%).

- Looking at **air travel**, respondents who left education aged 20 or over (51%) are more likely to have taken a plane than those who left at 19 or under (37-41%). The same pattern can be seen at people who live in large towns (51%), at self-employed (58%) respondents and employees (50%).

- Turning to **train** travel, respondents in the 15-24 age bracket (45%) are more likely to have travelled by train at least once than people in the three older age groups (26-30%). People who left education aged 20 or over (34%) are more likely to have taken a train than those who left school at 15 or under (21%). Those who live in large towns (34%) are more likely to have taken a train than respondents who live in rural villages (21%).

- Respondents in the 15-24 age group (35%) and in the 55+ bracket are more likely to have travelled by **bus** at least once than people aged 25-54 (13-14%). And people who are not working (28%) and manual workers (21%) were more likely to have gone by bus than employees or self-employed workers (12-13%).

Q7 How many times did you use the following means of transport to travel to your holiday destination in 2011…? %'At least one time'

	Car/ Motorbikes	Airplane	Train	Bus	Boat
EU27	78%	46%	29%	20%	14%
Sex					
Male	80%	46%	28%	19%	14%
Female	76%	45%	30%	22%	13%
Age					
15-24	74%	48%	45%	35%	15%
25-39	83%	48%	26%	14%	13%
40-54	84%	46%	22%	13%	13%
55 +	73%	43%	28%	24%	14%
Education (End of)					
15-	68%	37%	22%	26%	12%
16-19	79%	41%	24%	19%	13%
20+	81%	51%	30%	16%	15%
Still studying	74%	47%	46%	37%	14%
Subjective urbanisation					
Rural village	82%	42%	21%	19%	13%
Small/ Mid-size town	78%	45%	30%	20%	13%
Large town	75%	51%	34%	22%	15%
Respondent occupation scale					
Self-employed	82%	58%	26%	13%	16%
Employee	84%	50%	25%	12%	14%
Manual workers	76%	40%	25%	21%	12%
Not working	73%	41%	33%	28%	12%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

46

2.4   Satisfaction with the main holidays taken in 2011

- Over 90% of respondents express satisfaction with the natural features and the quality of accommodation at their holiday destination –

Over nine out of 10 (94%) respondents say that they were satisfied with the **natural features** of the place they went to on holiday, with 65% saying they were very satisfied and 29% fairly satisfied.

A similarly large majority (93%) of respondents say that they were satisfied with the **quality of accommodation** in the place they stayed, with 54% saying they were very satisfied and 37% fairly satisfied.

Over eight people in 10 (85%) were satisfied by **the way in which tourists were welcomed**, with 47% saying they were very satisfied and 38% fairly satisfied. Just 5% say they were not satisfied with the welcome shown to tourists.

Over eight respondents in 10 (82%) were also satisfied by **the general level of prices**. However, only 28% say they were very satisfied, whereas 54% that they were only fairly satisfied. Over one in 10 (13%) say they were not satisfied with the general level of prices, with 11% not very satisfied and 2% not at all satisfied.

Just under eight out of 10 people (79%) say they were satisfied by **the activities on offer**, with 36% saying they were very satisfied and 43% saying that they were fairly satisfied.

Q11. Now thinking about your main holidays in 2011, how satisfied were you with...?
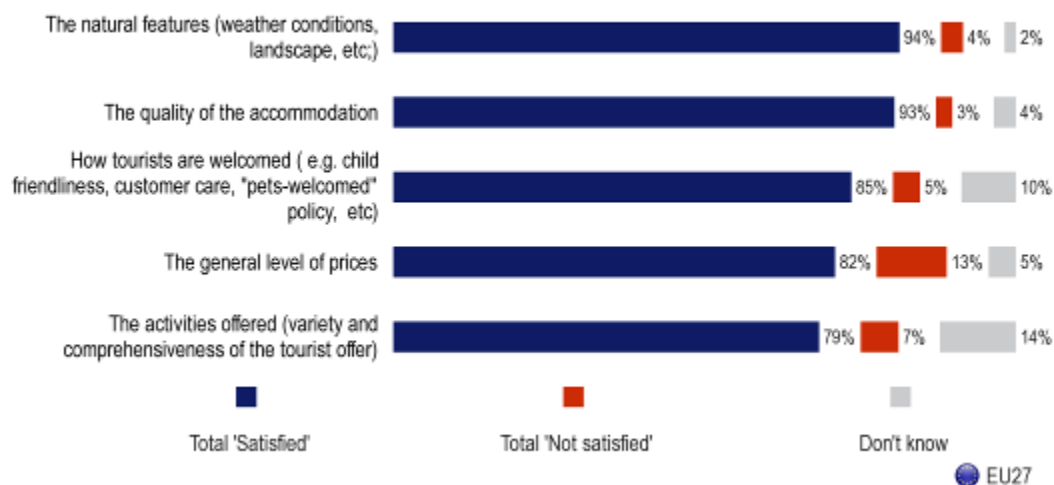
Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

In all but eight of the 34 countries included in the survey over 90% of respondents say that they were satisfied with the **quality of accommodation** that they experienced on their holiday. Satisfaction was highest among respondents in Macedonia (98%), Belgium (97%), Austria (96%), Germany (96%) and Slovenia (96%). At the bottom of the list 71% of respondents in Turkey expressed satisfaction with their accommodation. Satisfaction also relatively low was in Bulgaria and Greece (both 79%).

BE	97%	
AT	96%	
SI	96%	
DE	96%	
LU	95%	
LV	95%	
FI	95%	
PT	94%	
UK	94%	
IE	94%	
MT	94%	
DK	94%	
EU	93%	
SE	93%	
FR	93%	
ES	92%	
NL	92%	
PL	92%	
CZ	92%	
HU	91%	
LT	91%	
IT	91%	
SK	89%	
CY	89%	
RO	88%	
EE	85%	
BG	79%	
EL	79%	
MK	98%	
IS	94%	
HR	91%	
TR	71%	
RS	95%	
NO	93%	
IL	86%	

Question: Q11.1. Now thinking about your main holidays in 2011, how satisfied were you with...?

Option: The quality of the accommodation

Answers: Total 'Satisfied'
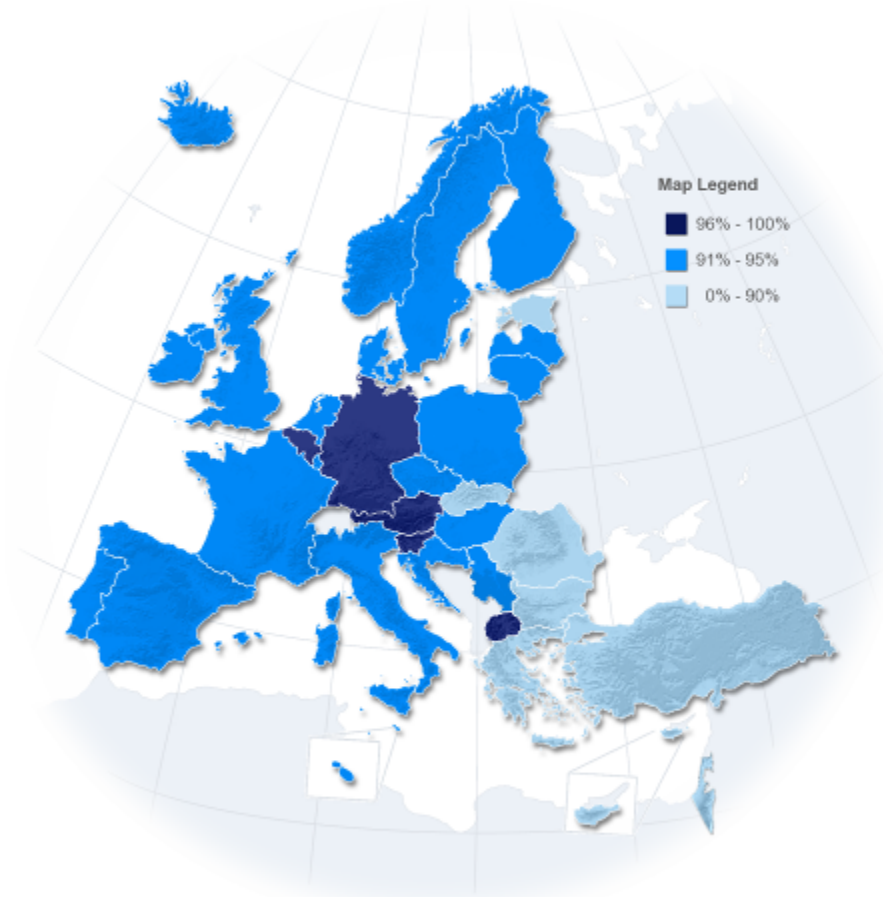
Map Legend
- 96% - 100%
- 91% - 95%
- 0% - 90%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

When considering the **natural features** of their holiday destination, over 90% of respondents in all but five countries say that they were satisfied with their experience.

Satisfaction was again highest among respondents in Macedonia (99%), followed by Austria, Cyprus Germany, Ireland, Portugal, Lithuania and Slovenia (all 96%). The level of satisfaction was again lowest among respondents in Turkey (77%), followed by those in Israel (87%), Bulgaria (89%), Poland (89%) and Romania (89%).
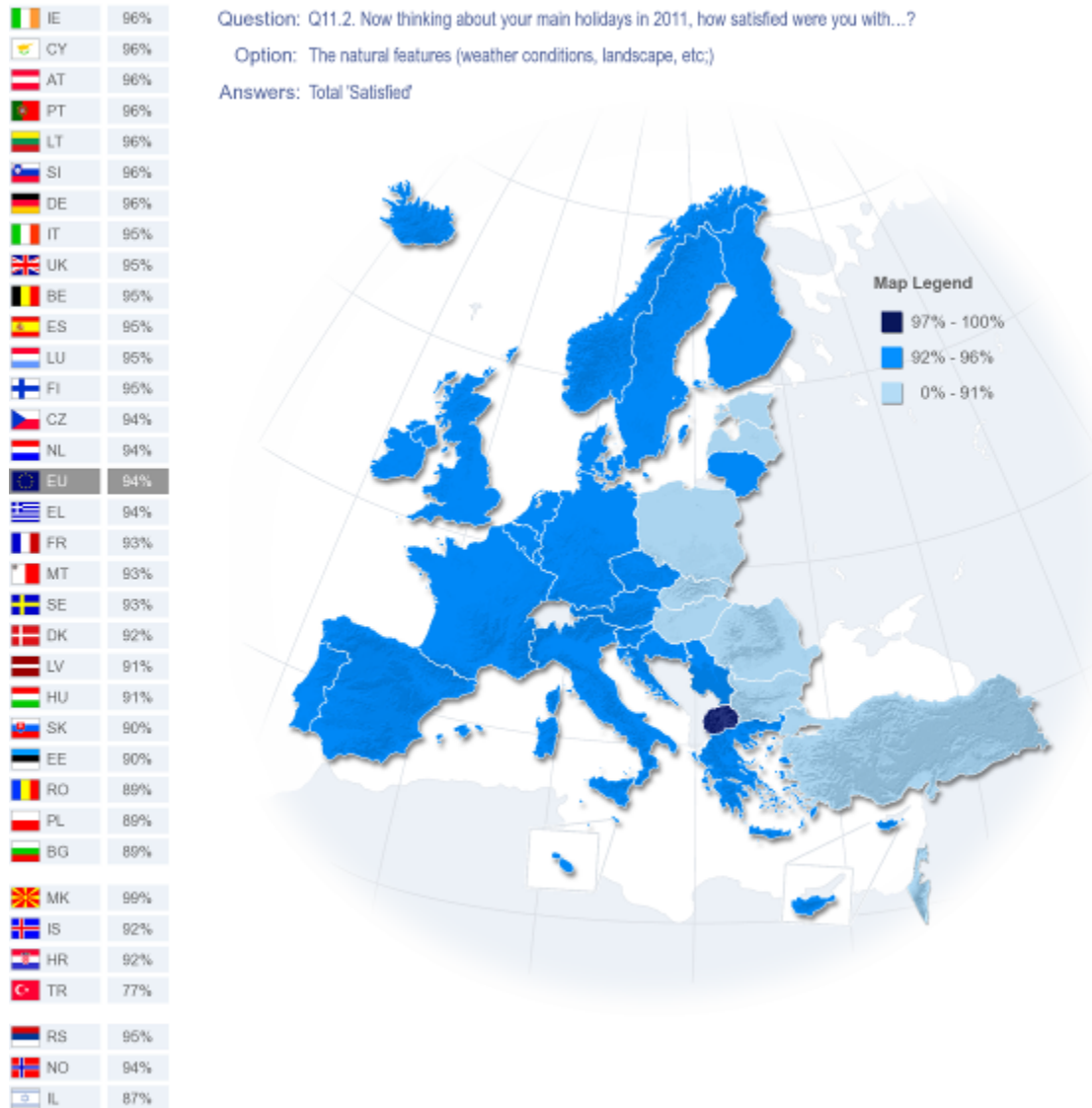
IE	96%	
CY	96%	
AT	96%	
PT	96%	
LT	96%	
SI	96%	
DE	96%	
IT	95%	
UK	95%	
BE	95%	
ES	95%	
LU	95%	
FI	95%	
CZ	94%	
NL	94%	
EU	94%	
EL	94%	
FR	93%	
MT	93%	
SE	93%	
DK	92%	
LV	91%	
HU	91%	
SK	90%	
EE	90%	
RO	89%	
PL	89%	
BG	89%	
MK	99%	
IS	92%	
HR	92%	
TR	77%	
RS	95%	
NO	94%	
IL	87%	

Question: Q11.2. Now thinking about your main holidays in 2011, how satisfied were you with…?

Option: The natural features (weather conditions, landscape, etc;)

Answers: Total 'Satisfied'

Map Legend
- 97% - 100%
- 92% - 96%
- 0% - 91%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

In five countries at least 90% of respondents express satisfaction with **the general level of prices** that they encountered on their holiday. They are: Belgium (92%), Austria (91%), the UK (91%), Germany (90%), and Norway (90%). However, in six countries fewer than seven people in 10 say that they were satisfied with the general level of prices at their holiday destination. In Turkey, under half (49%) express satisfaction, with a relatively low proportion also doing so in Greece (61%), Croatia (66%), Bulgaria (67%), Romania (67%), Lithuania (69%).
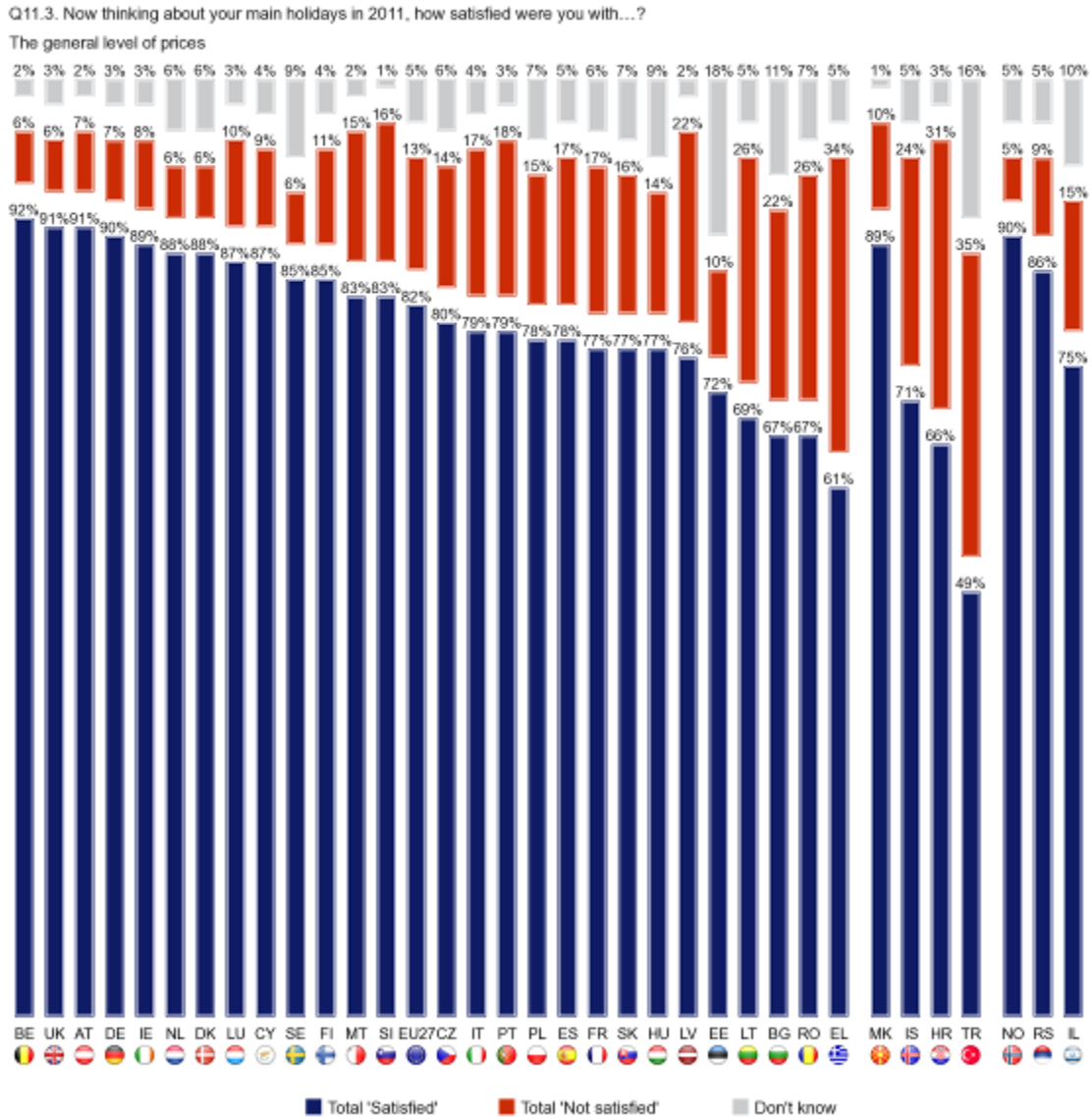
Q11.3. Now thinking about your main holidays in 2011, how satisfied were you with...?
The general level of prices

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

The activities on offer appeared satisfactory to over 90% of respondents in only two countries, Serbia and Iceland, where 91% and 90% of respondents respectively say that the activities were satisfactory. Relatively high numbers of people also say this in Finland (88%), Macedonia (87%), Slovenia (86%) and Austria (86%). However, satisfaction with the activities on offer was relatively low among holidaymakers in Turkey (58%), Greece (65%), Hungary (67%) and Bulgaria (68%). On this question respondents quite commonly say they don't know whether the activities on offer had were satisfactory, especially those in Hungary (28%) and Estonia (26%).
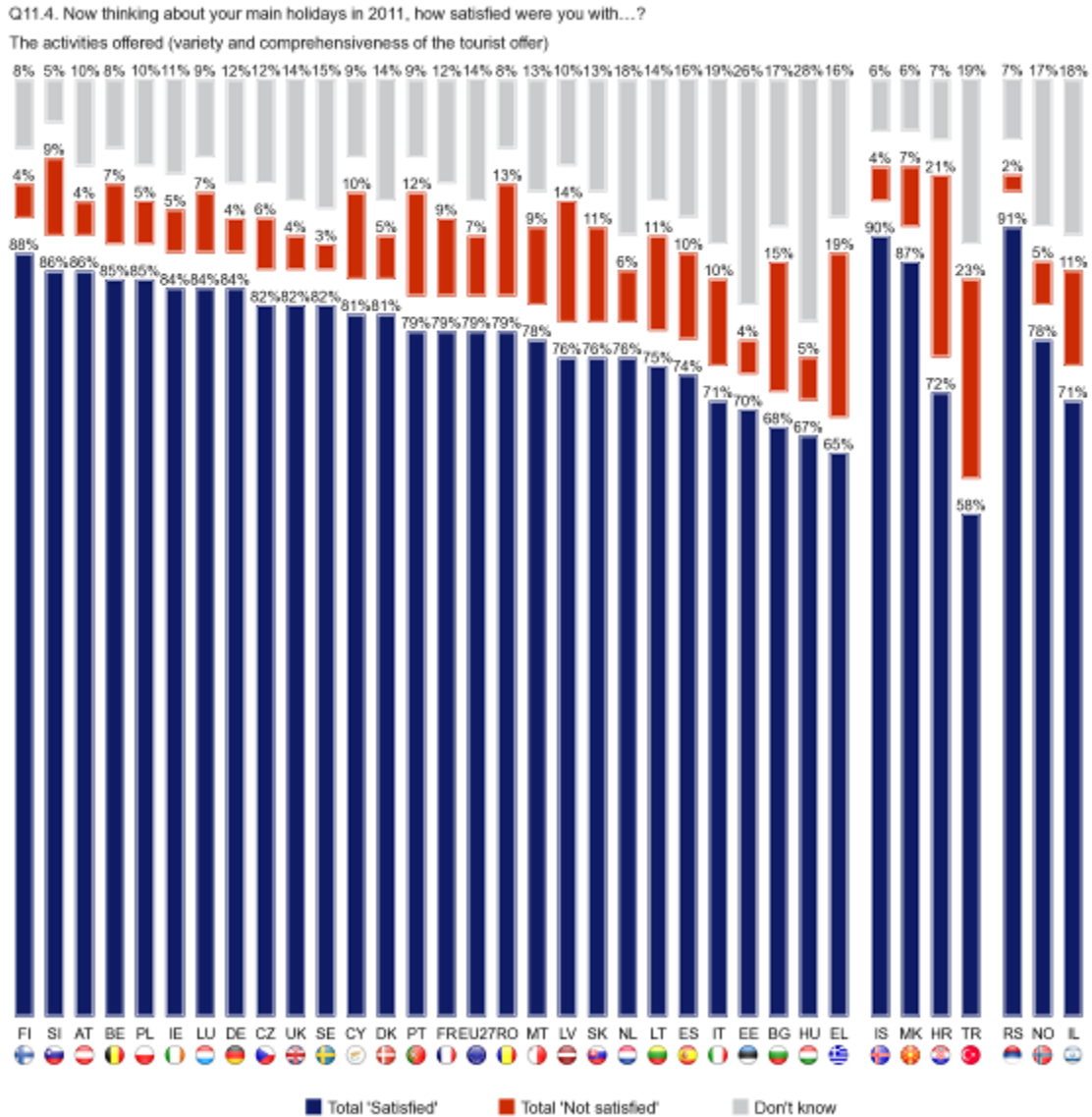
Q11.4. Now thinking about your main holidays in 2011, how satisfied were you with…?
The activities offered (variety and comprehensiveness of the tourist offer)

Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

When asked whether **the way in which tourists were welcomed** struck them as being satisfactory, at least 90% of respondents in nine countries say that they were satisfied by this on their holiday. Satisfaction with the level of hospitality was highest in Ireland (94%), Serbia (94%), Austria (93%) and Belgium (93%). The lowest levels of satisfaction on this criteria were registered in Turkey (59%), Estonia (68%) and Bulgaria (72%). However, a relatively high number of people also say that they don't know whether the welcome shown to tourists was satisfactory in these countries (Estonia – 29%; Turkey – 23%; Bulgaria – 17%).
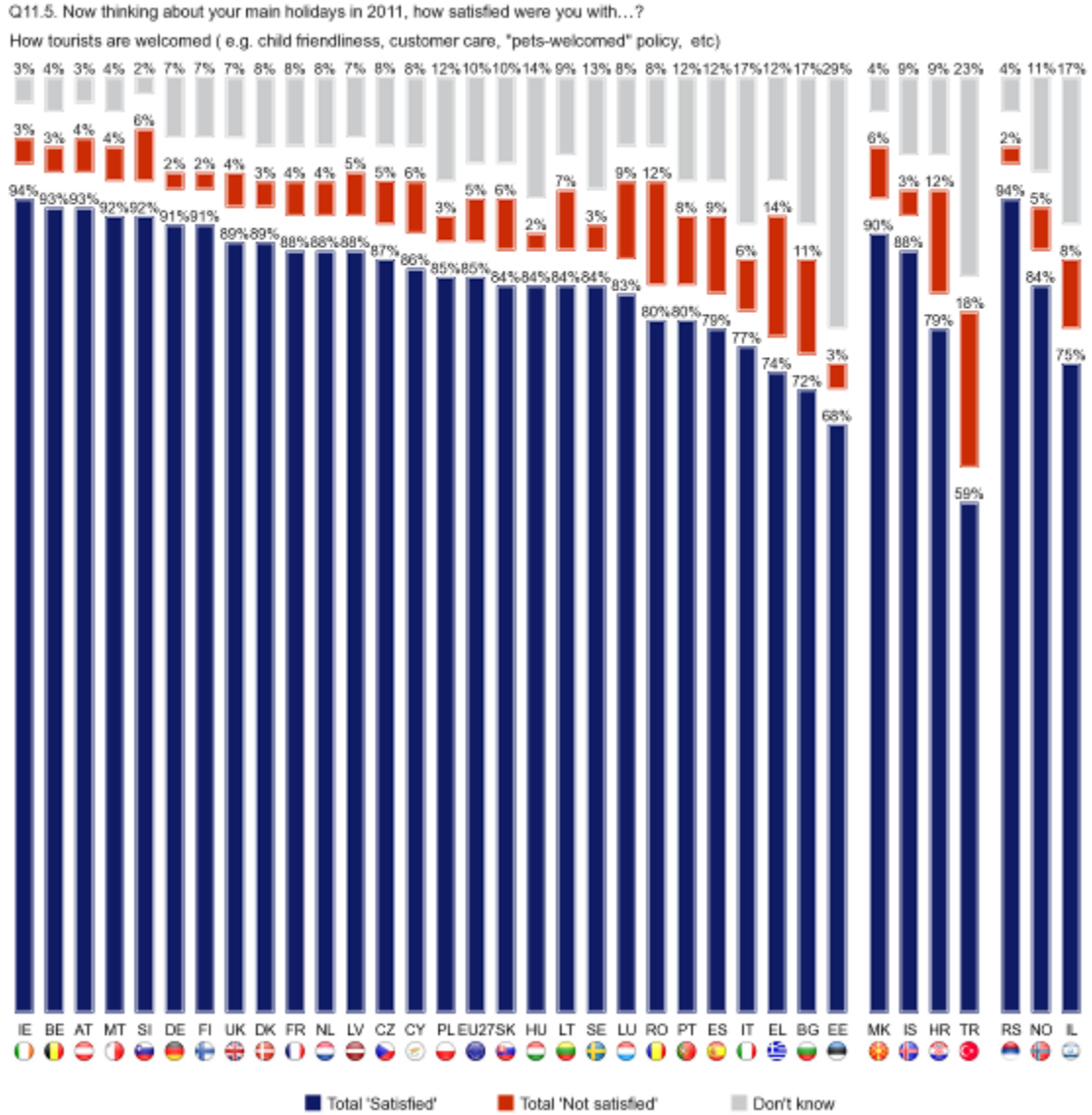
Q11.5. Now thinking about your main holidays in 2011, how satisfied were you with...?
How tourists are welcomed (e.g. child friendliness, customer care, "pets-welcomed" policy, etc)

Base: 60% from the total number of respondents
(Those who went on holiday for at least four nights in 2011)

The socio-demographic variations are generally only minor on this question. However, there are some notable findings:

- Women are more likely than men to say that they are very satisfied with their experience, especially with reference to their destination's **natural features** (68% vs. 63%) and the quality of accommodation (58% vs. 53%). However, overall levels of satisfaction are very similar for men and women (92-93%).

- Older respondents are more likely to say that they are very satisfied, especially when it comes to the **quality of accommodation**. While 62% of people aged 55 and over say they are very satisfied, this falls to 46% among 15-24 year-olds. Overall levels of satisfaction are very similar across the different age groups, however (92-94%).

- People who left school at a younger age are more likely to say that they are very satisfied with their experience on certain criteria. For example, people who left school aged 15 or under are more likely to be very satisfied with the **general level of prices** (34% vs. 26% of people who left aged 20 or over), and also with the quality of accommodation (63% vs. 56% of people who left aged 20 or over). However, respondents who left education aged 15 or under are the least likely to express satisfaction (i.e. either very satisfied or fairly satisfied) over the quality of accommodation and the general level of prices.

Q11 Now thinking about your main holidays in 2011, how satisfied were you with…? %
Total 'Satisfied'

	The quality of the accommodation	The natural features (weather conditions, landscape, etc;)	The general level of prices
EU27	93%	94%	82%
Sex			
Male	93%	94%	83%
Female	92%	94%	83%
Age			
15-24	94%	93%	81%
25-39	93%	94%	82%
40-54	93%	94%	84%
55 +	92%	94%	82%
Education (End of)			
15-	90%	92%	79%
16-19	93%	94%	84%
20+	94%	94%	83%
Still studying	93%	93%	81%

Base: 60% from the total number of respondents (15 848 respondents)
(Those who went on holiday for at least four nights in 2011)

3. TRAVELLERS' PROFILE IN 2011

This chapter addresses the travel patterns of respondents in 2011. All respondents were first asked whether they had spent at least one night travelling away from home either for business or private purposes. Those who answered positively to this question were then asked whether they had spent less than four nights and secondly more than four nights, in certain types of accommodation, including paid accommodation such as hotels, and at the homes of friends or relatives.

3.1   Proportion of respondents who travelled in 2011

- Over seven out of 10 respondents travelled either for business or private purposes in 2011 –

Over seven out of 10 (72%) respondents said they travelled at least once in 2011 – similar to the proportion registered in 2010, when the results were obtained from a smaller sample.

The results show a fairly even distribution in terms of the number of times people travelled for business or private purposes for at least one night during 2011. 15% of respondents said that they travelled once in 2011 (-1 point compared with 2010); 12% travelled twice (-2 points); 10% went away from home three times (-1 point); 13% travelled four or five times (no change on the previous year); 11% went away from home between six and 10 times (+1 point); and 11% travelled more than 10 times (+3 points). Just over a quarter (26%) of respondents did not travel at all (-1 point).

Q1. During 2011, how many times have you travelled for business or private purposes, where you were away from home for a minimum of one night?
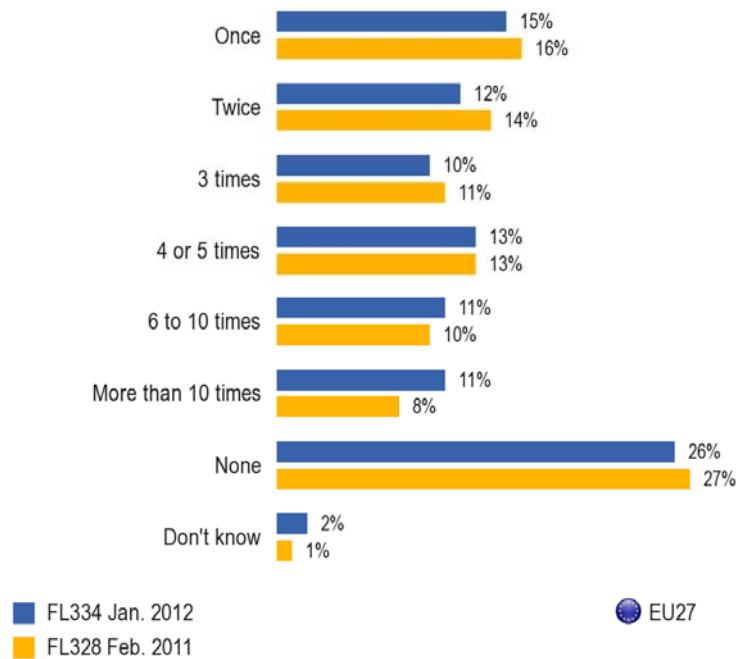
Base: Total number of respondents

On this question, it is interesting to compare the results of the EU15 and NMS12 countries. While almost three quarters (74%) of EU15 respondents said that they had taken at least one overnight trip in 2011, only 65% of their NMS12 counterparts said the same thing.

In all but two of the 34 countries under consideration here – namely Serbia (42%) and Turkey (44%) – a majority of respondents said that they had made an overnight trip for either private or business purposes at least once in 2011. In nine countries over 80% of respondents did so, with the highest proportions of people who made at least one overnight trip being reported in Norway (90%), Iceland (88%), Denmark (87%), Ireland (86%) and Sweden (86%). Among EU countries, the lowest rate of travel among citizens occurred in Malta (50%) and Portugal (54%).

SK	72%	+13
EE	73%	+10
HU	55%	+10
SI	83%	+7
CY	73%	+6
CZ	70%	+6
IT	69%	+5
IE	86%	+3
AT	81%	+3
PL	69%	+2
DE	80%	+1
DK	87%	=
EU27	72%	=
RO	58%	=
SE	86%	-1
UK	77%	-1
ES	66%	-3
LV	62%	-3
FI	84%	-5
LU	80%	-5
FR	74%	-5
BG	61%	-5
PT	54%	-5
LT	62%	-7
BE	66%	-8
NL	78%	-9
MT	50%	-13
EL	63%	-14
TR	44%	+7
IS	88%	+5
HR	69%	-1
MK	51%	-15
NO	90%	+7
IL	69%	=
RS	42%	=

Question: Q1. During 2011, how many times have you travelled for business or private purposes, where you were away from home for a minimum of one night?

Answers: I have travelled in 2011

Map Legend

- Positive
- Stable
- Negative

Evolution since February 2011

Base: Total number of respondents

Comparing these results with those of the February 2011 survey[2], it is clear that although there was no change when looking at the aggregate results, some individual countries experienced large variations in the proportions of people who travelled for at least one night. For example, sizeable increases were seen in Slovakia (72%, +13 points), Estonia (73%, +10 points) and Hungary (55%, +10 points). By contrast, large falls in the number of people who made an overnight trip were observed in Macedonia (51%, -15 points), Greece (63%, -14 points) and Malta (50%, -13 points).

The socio-demographic data show that:

- Men (74%) were slightly more likely than women (70%) to have travelled overnight in 2011.

- Younger respondents were more likely to have travelled. While 79% of 15-24 year-olds said that they had spent at least one night away, this falls to 76% among 25-39 year-olds, 74% among 40-54 year-olds, and to 65% among the 55+ group.

- Individuals who spent longer in education were the most likely to have travelled during 2011. While 81% of people who left education aged 20 or over said that they had spent at least one night away, only 69% of people who left school aged 16-19 and 50% of those who left aged 15 or under said the same thing.

- Three quarters (75%) of respondents who live in large towns travelled in 2011, compared with 68% of people who live in rural villages.

- Over eight out of 10 (83%) employees and 77% of self-employed respondents made an overnight trip in 2011, compared with only 67% of manual workers and 65% of people who are not working.

[2] Israel and Serbia were not included in previous waves of this survey, and so are not subject to trend analysis.

Q1 During 2011, how many times have you travelled for business or private purposes, where you were away from home for a minimum of one night?

	Have travelled in 2011	Have not travelled at all in 2011	Don't know
EU27	72%	26%	2%
Sex			
Male	74%	23%	3%
Female	70%	28%	2%
Age			
15-24	79%	18%	3%
25-39	76%	22%	2%
40-54	74%	24%	2%
55 +	65%	33%	2%
Education (End of)			
15-	50%	48%	2%
16-19	69%	29%	2%
20+	81%	17%	2%
Still studying	84%	13%	3%
Subjective urbanisation			
Rural village	68%	30%	2%
Small/ Mid-size town	73%	25%	2%
Large town	75%	22%	3%
Respondent occupation scale			
Self-employed	77%	20%	3%
Employee	83%	15%	2%
Manual workers	67%	30%	3%
Not working	65%	33%	2%

Base: Total number of respondents

58

3.2   Holidays of less than four nights taken in 2011

- A majority of respondents who went on holiday for less than four nights stayed in paid accommodation –

A majority (54%) respondents who went on holiday for less than four nights at least once in 2011 said they stayed at least once in paid accommodation, such as a hotel or rented apartment, while just under half (47%) said that they stayed with friends or relatives. Just under a fifth (18%) of respondents said they stayed in their own property or second home, while over one in 10 said they stayed in another type of location (14%) or on a camping site (12%).

On the subject of whether people stayed in paid accommodation, 22% said they did so once in 2011, 14% did so twice, 7% did so three times, 4% did so four times, and 7% did so five times or more.

Among the 47% of respondents who said they stayed with friends or relatives, 13% did so once, 10% did so twice, 6% did so three times, 4% did so four times, and 14% did so five times or more. 'Five times or more' was therefore the most popular answer amongst respondents who said they stayed with friends or relatives.

Among the 18% of respondents who said they stayed in their own property or second home, 5% did this once, 3% did so twice, 2% did so three times, 1% did so four times, and 7% did so five times or more. 'Five times or more' was therefore the most common answer amongst respondents who said they stayed in their own property or second home.

By contrast, people who stayed in another type of location or on a camping were more likely to do so only once.

Q2. And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:

	Once	Twice	3 times	4 times	5 times or more	None/ zero	Don't know
In paid accommodation (hotel/ rented apartment/house etc....)	22%	14%	7%	4%	7%	46%	0%
At friends or relatives	13%	10%	6%	4%	14%	53%	0%
In own property/ second home	5%	3%	2%	1%	7%	81%	1%
In another type of location	6%	3%	1%	1%	3%	85%	1%
On a camping site	6%	2%	1%	1%	2%	88%	0%

🌐 EU27
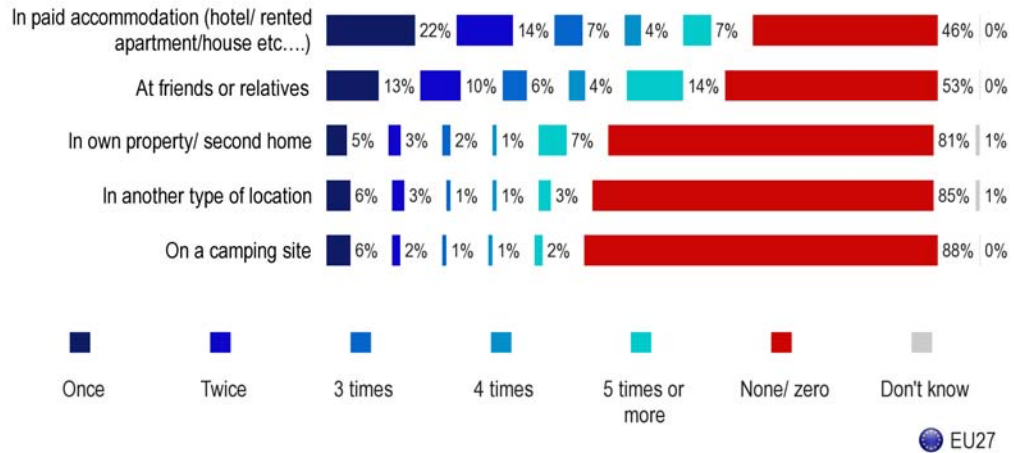
Base: 72% from the total number of respondents (19 114 respondents)
(Those who travelled for a minimum of one night in 2011)

There are some notable variations between EU15 and NMS12 responses on this question. NMS12 respondents were more likely to say that they stayed in a second home than EU15 respondents, by a margin of 28% to 17%. People in the NMS12 countries were also more likely than those in the EU15 to say that they stayed with friends or relatives, by a margin of 59% to 44%.

In 22 of the 34 countries included in this survey, over half of the respondents said they had stayed **in paid accommodation** while on a holiday that last less than four nights. Staying in this type of accommodation was most common among respondents in Ireland (70%), Israel (67%), Finland (64%) and Luxembourg (64%). At the other end of the scale, relatively few people stayed in paid accommodation in Serbia (20%), Macedonia (37%), Croatia (39%) and Estonia (40%).
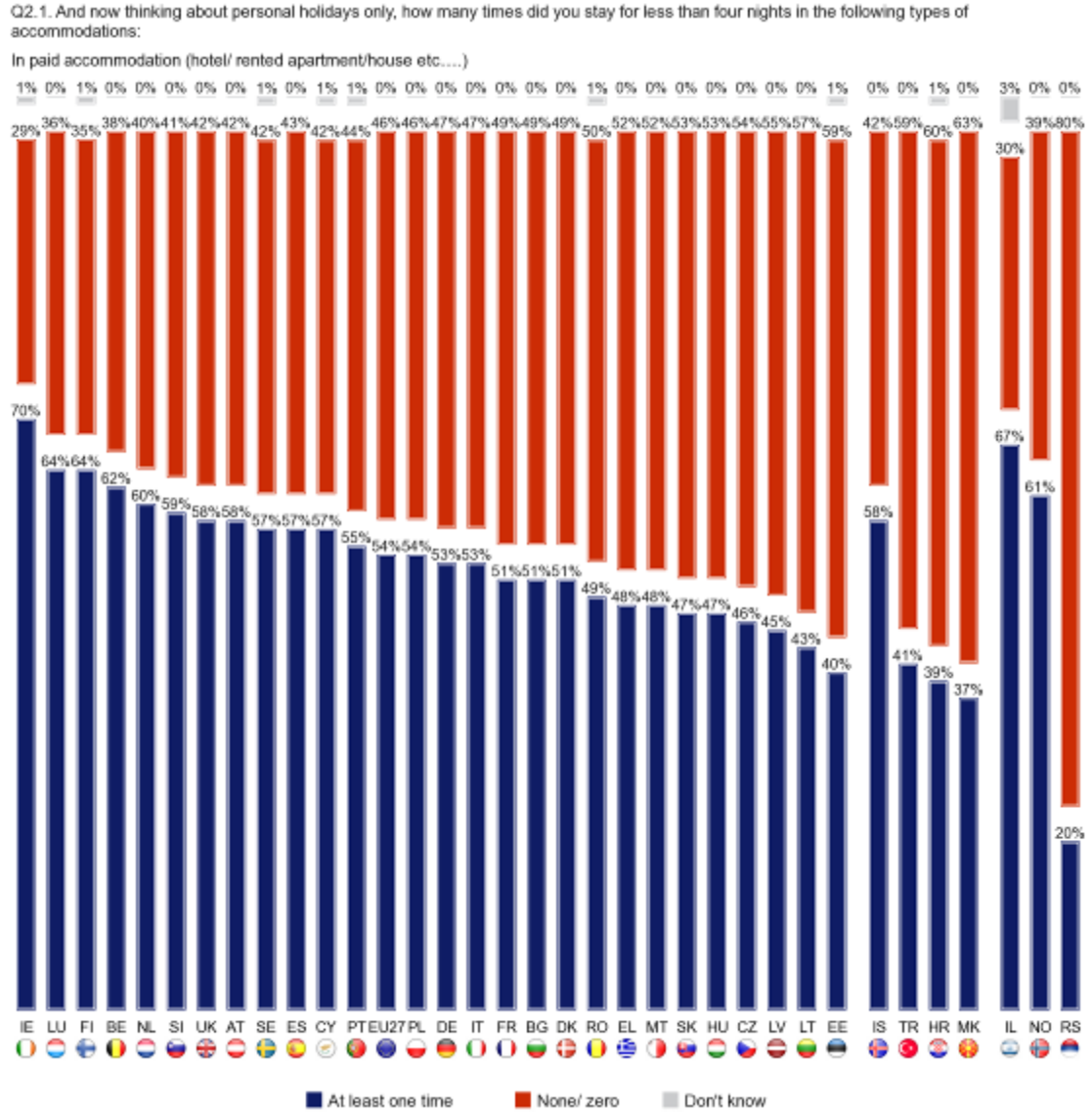
Q2.1. And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:

In paid accommodation (hotel/ rented apartment/house etc.....)

Base: 72% from the total number of respondents (19 114 respondents)
(Those who travelled for a minimum of one night in 2011)

In 18 countries, a majority of respondents said that they stayed **with friends or relatives** during 2011. Doing this was most common among respondents in Latvia (74%), followed by Lithuania (66%), the Czech Republic (64%) and Poland (64%). But in Malta (10%), Cyprus (30%) and Italy 31%) it was relatively unusual for people to stay overnight with friends or relatives.

Q2.3. And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:

At friends or relatives

■ At least one time   ■ None/ zero   ■ Don't know
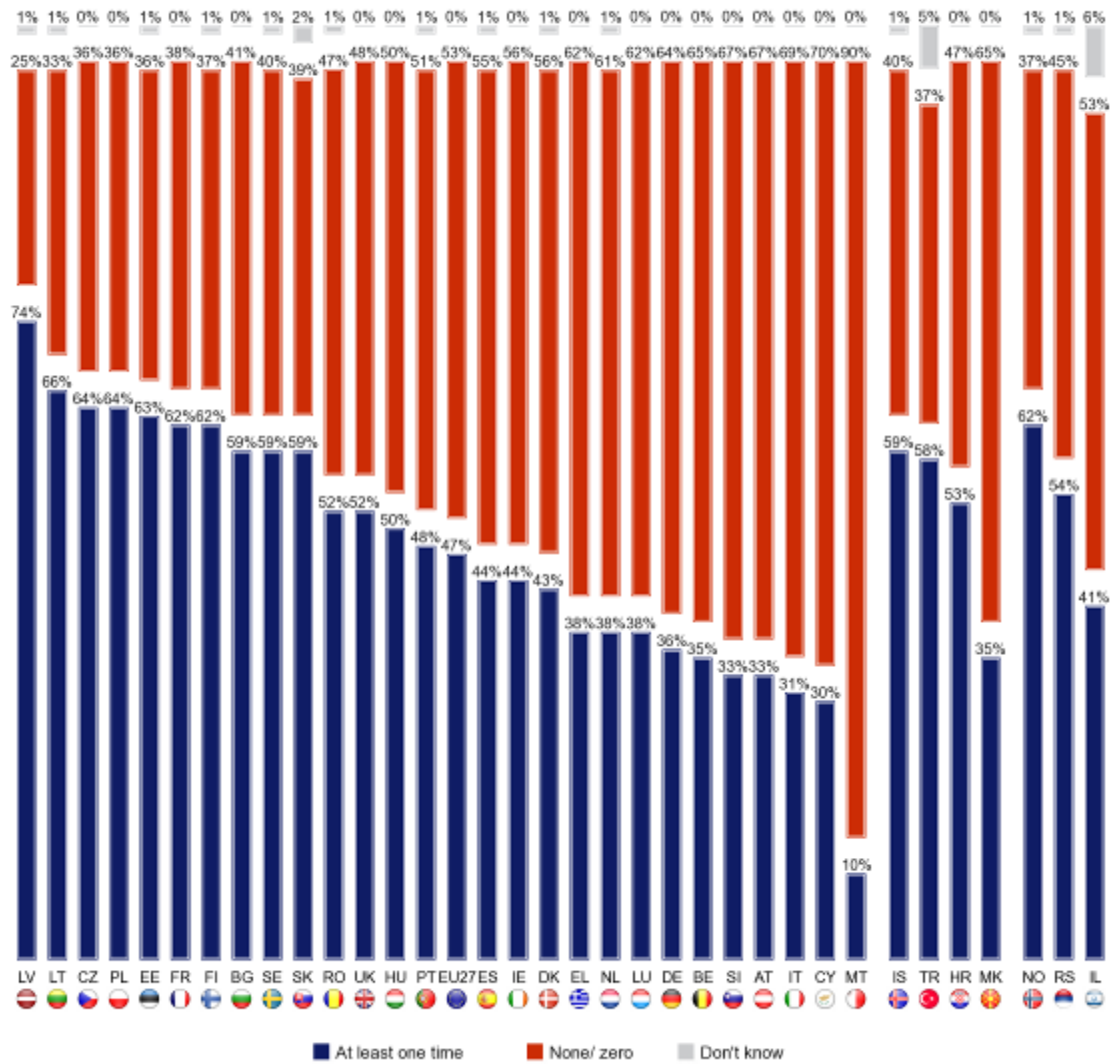
Base: 72% from the total number of respondents (19 114 respondents)
(Those who travelled for a minimum of one night in 2011)

Staying **in one's own property or second home** was far more common in some countries than in others. In four countries at least four people out of 10 said that they did this during 2011: Norway (49%), Slovakia (44%), the Czech Republic (43%) and Bulgaria (40%). However, less than a tenth of respondents stayed in a second home in Malta (4%), the Netherlands (7%) and Israel (9%).

While staying **in another type of location** was not particularly common in most countries, in five countries at least 20% of respondents said that they had done this when on a holiday lasting no more than four nights. They are: Israel (29%), Norway (25%), Slovakia (22%), Latvia (21%) and Poland (20%). **Camping** was also not especially common in most countries. However, in Iceland a third (33%) of respondents said they had gone camping in 2011, with relatively high numbers of people also giving this answer in the Czech Republic, Romania and the UK (all 19%). According to the socio-demographic data:

- Respondents in the 25-39 age group (59%) are the most likely to have stayed in paid accommodation, while 15-24 year-olds are the most likely to have stayed with friends or relatives. Respondents aged 55 and over are the least likely to have stayed in paid accommodation and also with friends or relatives.

- People who left education aged 20 or over are the most likely to have stayed in paid accommodation (58%) and also to have stayed with friends or relatives (50%). Those who left school aged 15 or under are the least likely to have stayed in paid accommodation (41%) and also to have stayed with friends or relatives (34%).

- Self-employed respondents (62%) and employees (60%) are more likely to have stayed in paid accommodation than manual workers (51%) and those who are not working (48%).

Q2 And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:

	In paid accommodation (hotel/ rented apartment/house etc….)		At friends or relatives	
	At least one time	None/ zero	At least one time	None/ zero
EU27	54%	46%	47%	53%
Sex				
Male	56%	44%	47%	53%
Female	52%	48%	47%	53%
Age				
15-24	56%	43%	63%	36%
25-39	59%	41%	51%	49%
40-54	56%	44%	43%	57%
55 +	47%	53%	39%	61%
Education (End of)				
15-	41%	59%	34%	66%
16-19	52%	48%	43%	57%
20+	58%	42%	50%	50%
Still studying	58%	42%	65%	35%
Subjective urbanisation				
Rural village	53%	47%	45%	55%
Small/ Mid-size town	55%	45%	46%	54%
Large town	54%	46%	50%	50%
Respondent occupation scale				
Self-employed	62%	38%	45%	55%
Employee	60%	40%	48%	52%
Manual workers	51%	48%	47%	53%
Not working	48%	52%	48%	52%

Base: 72% from the total number of respondents (19 114 respondents)

(Those who travelled for a minimum of one night in 2011)

3.3   Personal holidays of minimum 4 nights taken in 2011

- A majority of respondents who spent at least one night away in 2011 stayed in paid accommodation for at least four nights –

A majority (60%) of respondents said that they had spent at least four nights in paid accommodation, such as a hotel or rented apartment, while just over one third (34%) said that they stayed with friends or relatives for four nights or more. Just under a fifth (19%) of respondents said they stayed in their own property or second home for a minimum of four nights, while just over one in 10 said they stayed in another type of location (11%) or on a camping site (11%).

On the question of how many times people stayed in paid accommodation, 29% said they did so once in 2011, 14% did so twice, 7% did so three times, 4% did so four times, and 6% did so five times or more.

Among the 34% of respondents who said they stayed with friends or relatives for four or more nights, 13% did so once, 7% did so twice, 4% did so three times, 2% did so four times, and 8% did so five times or more.

Among the 19% of respondents who said they stayed in their own property or second home, 6% did this once, 4% did so twice, 2% did so three times, 1% did so four times, and 6% did so five times or more.

Out of the 11% who stayed in another location, 5% said they did this only once, while 7% of the 11% who stayed on a camping site did this just once.

Q3. Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:
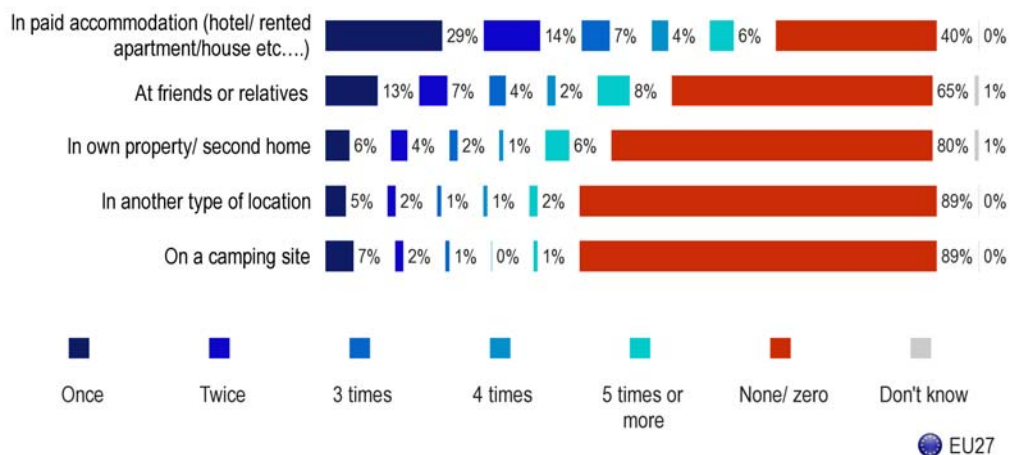
Base: 72% from the total number of respondents (19 114 respondents)
(Those who travelled for a minimum of one night in 2011)

When comparing the responses of people living in the EU15 countries and the NMS12 countries, we find that EU15 respondents who spent at least one night away during 2011 are more likely to have spent four or more nights in paid accommodation than those in the NMS12, by a margin of 62% to 49%.

In 22 of the 34 countries included in this wave of the survey a majority of respondents who spent at least one night away on holiday in 2011 spent a minimum of four nights **in paid accommodation**. In three countries at least seven out of 10 people did so: the Netherlands (73%), Slovenia (71%) and Denmark (70%). It is interesting to note that these are not the countries in which staying in paid accommodation for less than four nights was particularly common. Staying in paid accommodation for four or more nights was least common in Estonia (36%), Lithuania (37%) and Serbia (39%).
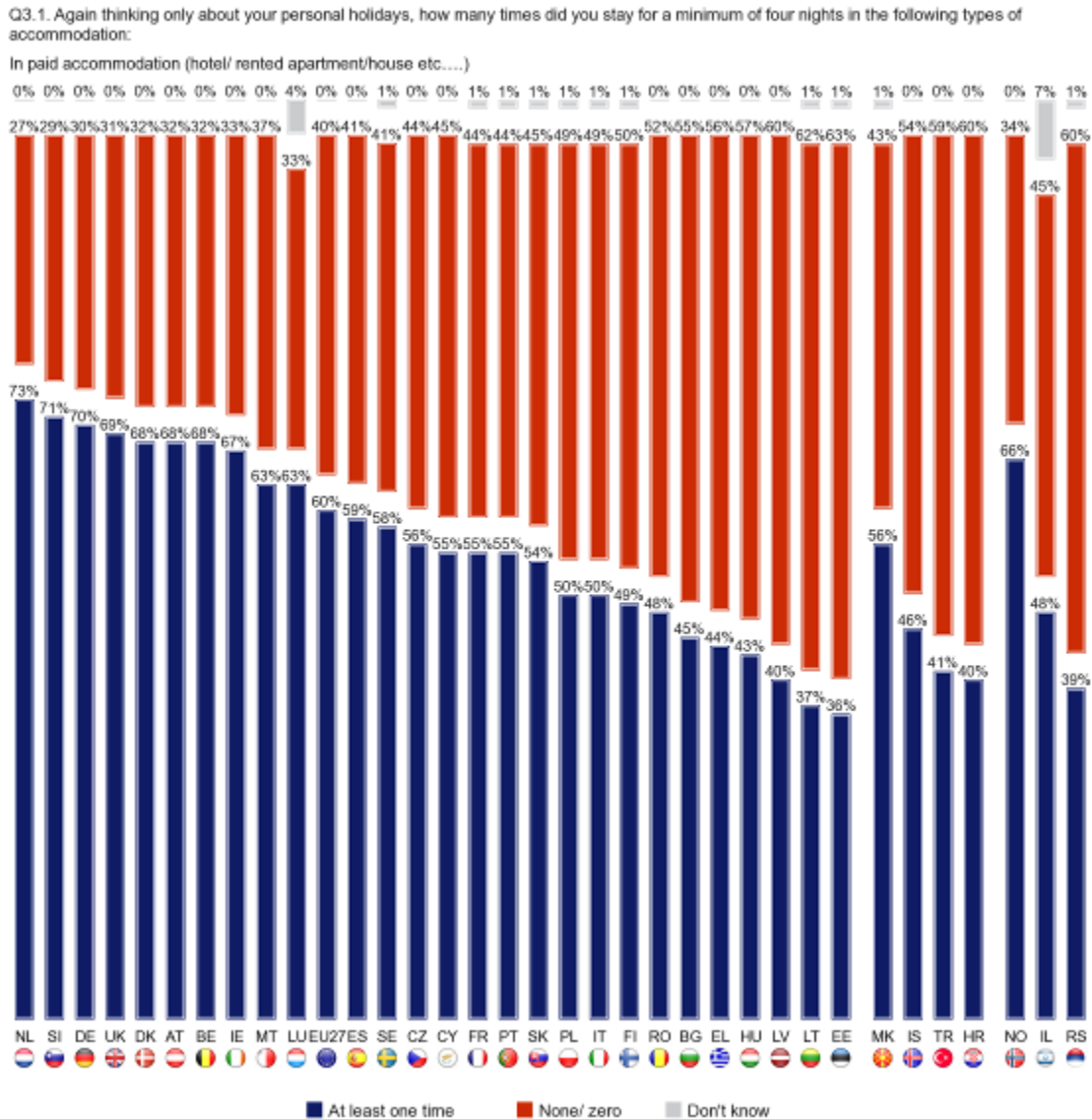
Base: 72% from the total number of respondents (19 114 respondents)
(Those who travelled for a minimum of one night in 2011)

France (55%) is the only country in which a majority of respondents who spent at least one night away in 2011 spent four or more nights staying with **friends or relatives**, although a relatively high proportion of people also did so in Poland (47%), Croatia (46%) and Turkey (46%). France was not, however, one of the countries where staying with friends or relatives for less than four nights was especially common. In another 16 countries at least a third of respondents gave this answer, although relatively few people stayed with friends or relatives for a minimum of four nights in Malta (19%), Austria (21%), Denmark (22%) and Israel (22%).
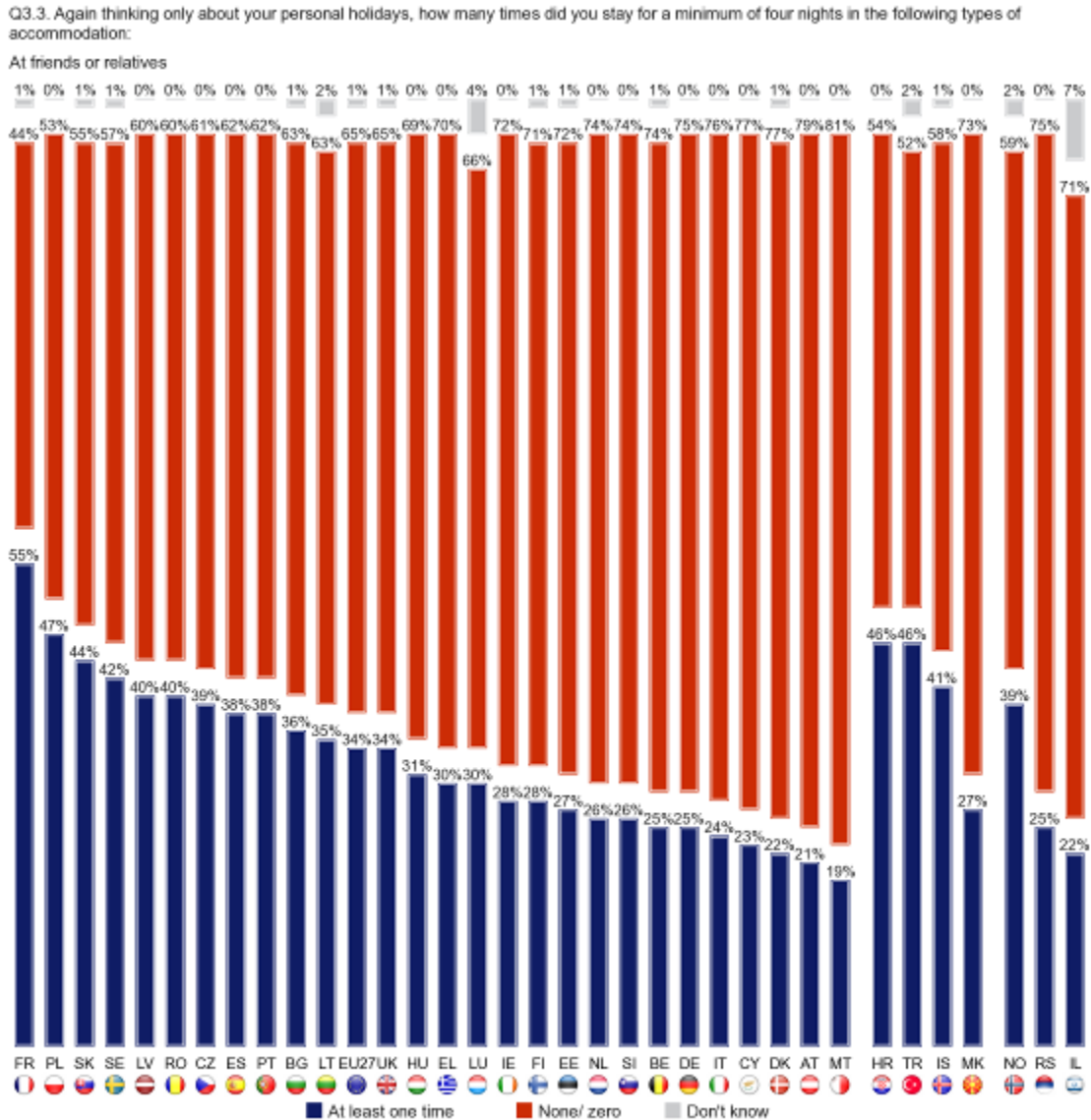
Q3.3. Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:

At friends or relatives

Base: 72% from the total number of respondents (19 114 respondents)
(Those who travelled for a minimum of one night in 2011)

In eight countries at least three out of 10 respondents who spent at least one night away in 2011 said that they had stayed **in their own property or second home** for four more nights. This was most popular amongst people in Norway (46%), followed by those in Greece (38%) and Slovakia (38%). However, relatively few respondents stayed in a second home for at least four nights in Malta (6%), Hungary (8%) and Israel (8%).

Relatively few people in most countries spent four or more nights on holiday **in another type of accommodation**, though at least 10% did so in 17 countries. Other types of accommodation were most commonly used in Norway (16%), the Czech Republic (15%), and Slovakia (15%). Similarly, at least a tenth of respondents who spent at least one night away in 2011 said that they spent a minimum of our nights **on a campsite** in 11 countries. In the Netherlands, a relatively high 28% of respondents said that they had done this, as did 16% in both France and Slovenia 16%.

The socio-demographic data show that:

- Men are again slightly more likely than women to have stayed in paid accommodation, by a margin of 61% to 58%.

- Respondents aged 40-54 (62%) are the most likely to have stayed in paid accommodation for at least four nights (whereas 25-39 year-olds were the most likely to have stayed in paid accommodation for less than four nights). People in the 15-24 age group (47%) are the most likely to have spent four or more night with friends or relatives.

- Respondents who spent more time in education are again more likely to have spent at least four nights in paid accommodation and also with friends and relatives.

- Employees (65%) and self-employed respondents (62%) are more likely to have stayed in paid accommodation than manual workers (52%) and people who are not working (56%). However, people who are not working (39%) are the most likely to have stayed with friends or relatives for at least four nights.

Q3 Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:

	In paid accommodation (hotel/ rented apartment/house etc….)		At friends or relatives	
	At least one time	None/ zero	At least one time	None/ zero
EU27	60%	40%	34%	65%
Sex				
Male	61%	39%	34%	66%
Female	58%	42%	36%	64%
Age				
15-24	58%	41%	47%	52%
25-39	58%	42%	35%	64%
40-54	62%	38%	29%	71%
55 +	60%	40%	32%	68%
Education (End of)				
15-	52%	47%	30%	70%
16-19	58%	42%	31%	69%
20+	63%	37%	35%	64%
Still studying	58%	42%	48%	51%
Subjective urbanisation				
Rural village	61%	39%	31%	69%
Small/ Mid-size town	58%	41%	35%	65%
Large town	60%	40%	38%	61%
Respondent occupation scale				
Self-employed	62%	37%	29%	71%
Employee	65%	35%	32%	68%
Manual workers	52%	47%	33%	66%
Not working	56%	44%	39%	61%

Base: 72% from the total number of respondents (19 114 respondents)

(Those who travelled for a minimum of one night in 2011)

69

4. HOLIDAY DISABLING FACTORS IN 2011 AND 2012

This chapter explores the reasons why some people chose not to go on holiday in 2011 and why some are not planning to do so in 2012. Respondents who said previously that they had not travelled in 2011 were asked to give their main reason for not taking a trip, such as for financial reasons. All respondents were then asked whether the current economic situation had had an impact on their holiday plans for 2012.

4.1   Reasons for not going on holidays in 2011

- Nearly half of the people who did not go on holiday in 2011 chose not to do so for financial reasons –

Over four out of 10 (45%) respondents said that they did not go on holiday for financial reasons, which is slightly more than the 43% who said this in the February 2011 survey. Just under a quarter (23%) of respondents said that they chose not to go away for personal or private reasons, down slightly on the 25% of people who said this in the previous wave. Roughly one respondent in 10 (11%) said that they preferred to stay at home with family or friends (+1 point compared with the previous survey) and that they did not go due to lack of time (9%, no change since last year).

Just 1% of respondents said they did not go on holiday because of problems of accessibility of transport or accommodations (+1 point), while virtually no respondents said they stayed at home on account of safety concerns (-1 point). A small minority (4%) also said spontaneously that they did not want to go on holiday in 2011 (+1 point), with 6% citing some other reason (-3 points). So while there have been some small changes in the number of people giving certain responses since the last survey, the ranking of responses has remained the same, with financial reasons and then personal/private reasons most commonly cited in both this wave and in the previous wave.

Q4. What was the main reason why you did not go on holiday in 2011?
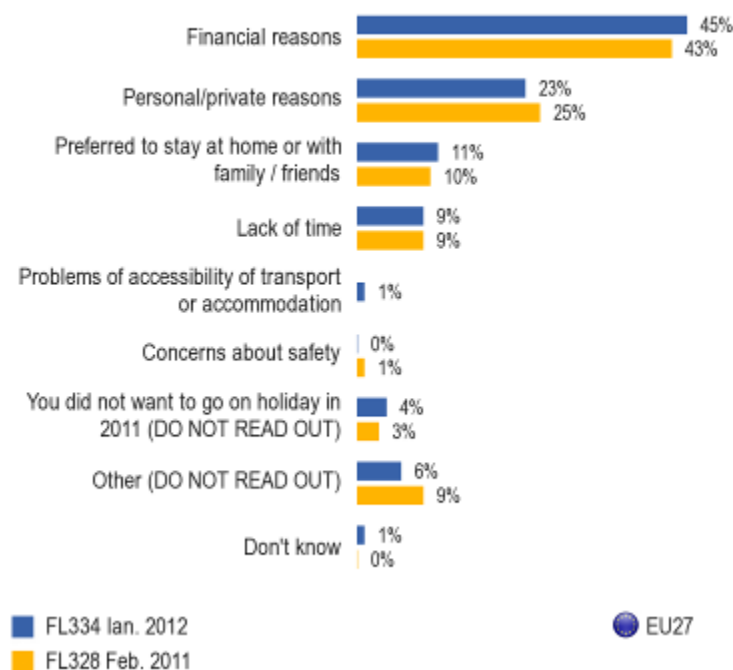
Financial reasons — 45% / 43%
Personal/private reasons — 23% / 25%
Preferred to stay at home or with family / friends — 11% / 10%
Lack of time — 9% / 9%
Problems of accessibility of transport or accommodation — 1%
Concerns about safety — 0% / 1%
You did not want to go on holiday in 2011 (DO NOT READ OUT) — 4% / 3%
Other (DO NOT READ OUT) — 6% / 9%
Don't know — 1% / 0%

■ FL334 Ian. 2012
■ FL328 Feb. 2011

⬤ EU27

Base: 28% from the total number of respondents (7 342 respondents)
(Those who didn't travelled in 2011)

In 12 countries a majority of respondents who did not go on holiday in 2011 said that they did not do so for **financial reasons**. People most commonly offered this explanation in Bulgaria (71%), Greece (70%), Hungary (66%), Ireland (62%) and Romania (62%). Relatively few people did not go on holiday for financial reasons in Austria (15%), Denmark (17%) and Finland (20%).

While the proportion of respondents citing financial reasons rose slightly at EU level (+2 points), it rose considerably in some individual countries, notably Ireland (62%, +18 points), Greece (70%, +14 points), Belgium (30%, +14 points) and Italy (46%, +10 points). However, the proportion of people not travelling for financial reasons also fell in some countries, with the biggest falls occurring in Austria (15%, -10 points), Denmark (17%, -10 points), Estonia (36%, -8 points) and Finland (20%, -8 points).
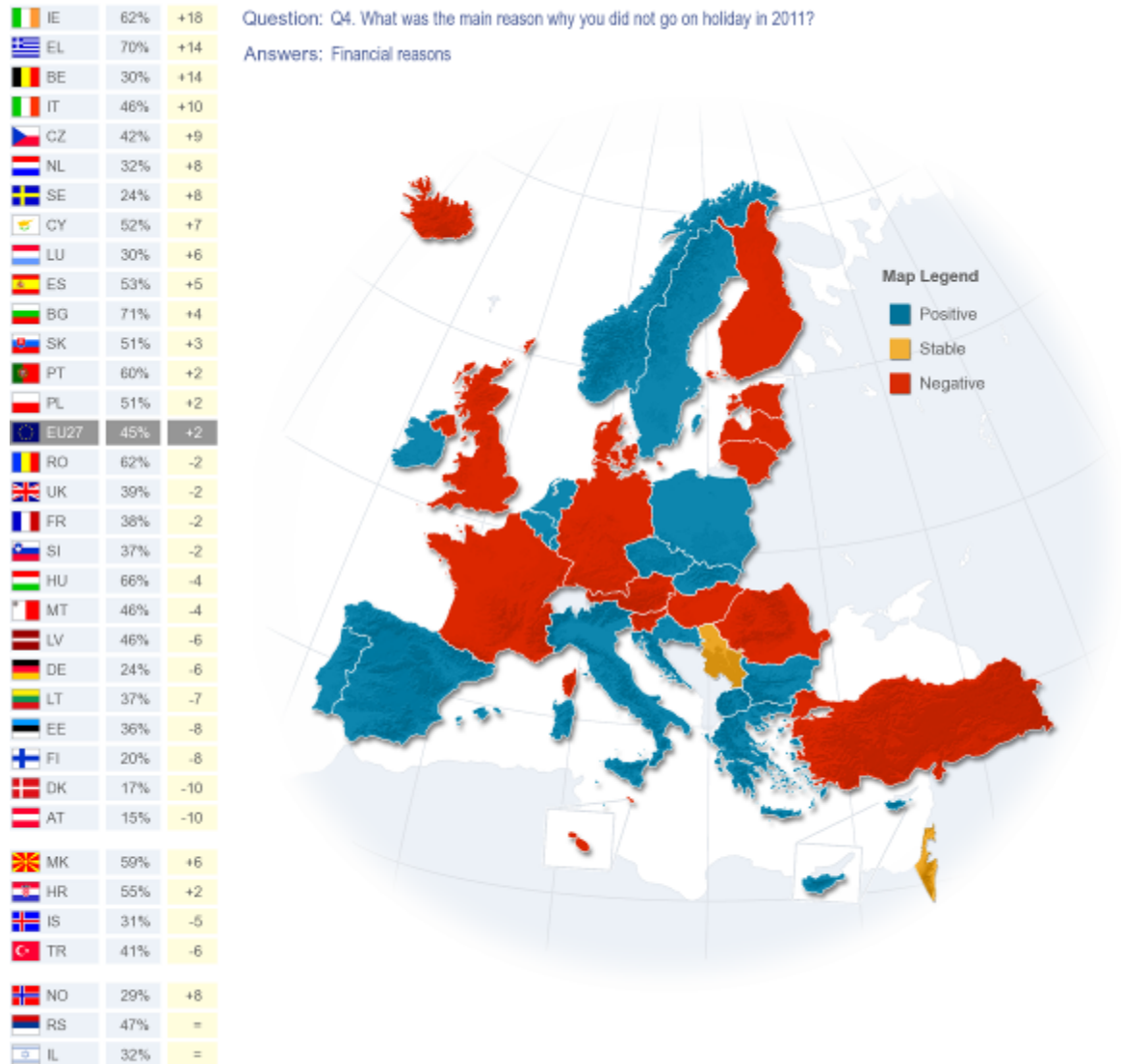
IE	62%	+18
EL	70%	+14
BE	30%	+14
IT	46%	+10
CZ	42%	+9
NL	32%	+8
SE	24%	+8
CY	52%	+7
LU	30%	+6
ES	53%	+5
BG	71%	+4
SK	51%	+3
PT	60%	+2
PL	51%	+2
EU27	45%	+2
RO	62%	-2
UK	39%	-2
FR	38%	-2
SI	37%	-2
HU	66%	-4
MT	46%	-4
LV	46%	-6
DE	24%	-6
LT	37%	-7
EE	36%	-8
FI	20%	-8
DK	17%	-10
AT	15%	-10
MK	59%	+6
HR	55%	+2
IS	31%	-5
TR	41%	-6
NO	29%	+8
RS	47%	=
IL	32%	=

Question: Q4. What was the main reason why you did not go on holiday in 2011?

Answers: Financial reasons

Map Legend

- Positive
- Stable
- Negative

Evolution since February 2011

Base: 28% from the total number of respondents (7 342 respondents)
(Those who didn't travelled in 2011)

In seven countries at least three out of 10 people who did not take a holiday in 2011 said they stayed at home for **personal or private reasons**. This explanation was most commonly given by respondents in Serbia (40%), followed by those in Austria (37%) and Germany (37%). But elsewhere, as in Portugal (10%) and Iceland (11%), relatively few respondents cited personal or private reasons.

At EU level the proportion of respondents who said that personal or private issues prevented them from travelling fell slightly (-2 points). However, it rose substantially in some individual countries, most obviously in Norway (25%, +18 points), Slovenia (34%, +11 points) and Lithuania (25%, +10 points). The proportion of people offering this explanation for their failure to travel in 2011 fell the most in Luxembourg (25%, -20 points), Iceland (11%, -10 points) and Italy (29%, -9 points).
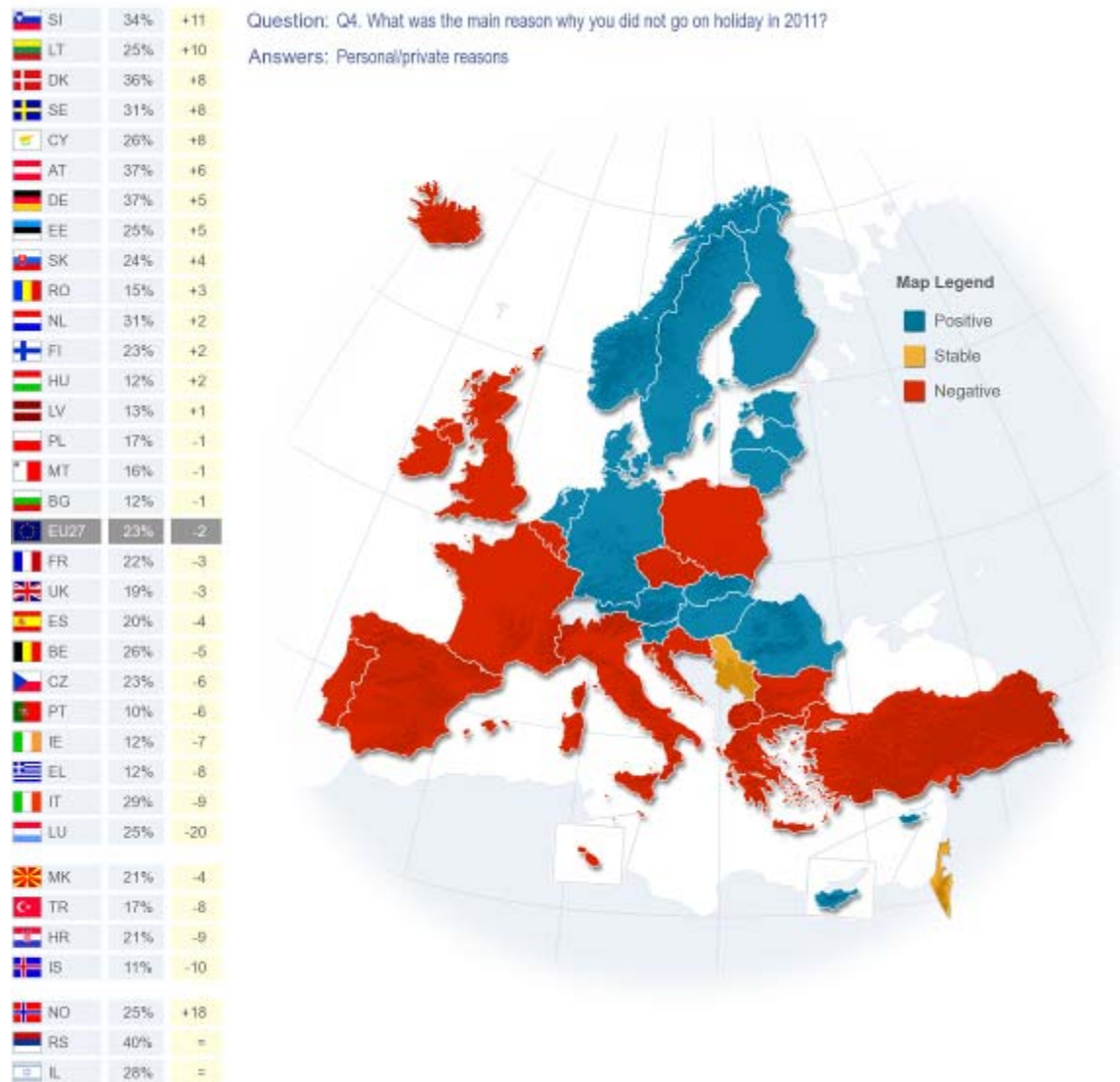
SI	34%	+11
LT	25%	+10
DK	36%	+8
SE	31%	+8
CY	26%	+8
AT	37%	+6
DE	37%	+5
EE	25%	+5
SK	24%	+4
RO	15%	+3
NL	31%	+2
FI	23%	+2
HU	12%	+2
LV	13%	+1
PL	17%	-1
MT	16%	-1
BG	12%	-1
EU27	23%	-2
FR	22%	-3
UK	19%	-3
ES	20%	-4
BE	26%	-5
CZ	23%	-6
PT	10%	-6
IE	12%	-7
EL	12%	-8
IT	29%	-9
LU	25%	-20
MK	21%	-4
TR	17%	-8
HR	21%	-9
IS	11%	-10
NO	25%	+18
RS	40%	=
IL	26%	=

Question: Q4. What was the main reason why you did not go on holiday in 2011?

Answers: Personal/private reasons

Map Legend
- Positive
- Stable
- Negative

Evolution since February 2011

Base: 28% from the total number of respondents (7 342 respondents)
(Those who didn't travelled in 2011)

While the proportion of respondents who said that they did not go on holiday because they **preferred to stay at home with friends or family** was generally quite low, at least 10% of respondents gave this answer in 20 countries. This reason for not travelling was most common in Finland (24%) Belgium (20%), and Norway (20%). The proportion of people giving this response also increased the most in Finland (+10 points) and Norway (+10 points).

In 14 countries at least a tenth of respondents said that they did not go on holiday in 2011 owing to a **lack of time**.

This explanation was most common in Turkey (19%), the Czech Republic (17%) and Germany (17%). The proportion of respondents blaming a lack of time also rose the most in the Czech Republic (+9 points) and Germany (+8 points).

Relatively high numbers of people said spontaneously that they **did not want to go on holiday** in 2011 in Malta (12%), Sweden (12%), Finland (11%) and the Netherlands (10%). **Other** explanations were given most frequently in Iceland (16%) and Lithuania (15%).

According to the socio-demographic data:

- Respondents in the 25-39 and 40-54 age groups (52% and 55% respectively) were more likely to say they did not go away for financial reasons than people in the 15-24 or 55+ age groups (39% and 37% respectively. People in the 55+ group were the most likely to say that they chose not to go for personal or private reasons (30%).

- While 48% of people who left school aged 19 or under cited financial reasons, only 39% of respondents who left education aged 20 or over gave this reason for not going away.

- A majority (56%) of manual workers said they did not take a holiday for financial reasons, compared with 44% of employees and people who are not working, and 36% of self-employed people. Respondents who are not working (26%) were the most likely to say that they did not go away for personal or private reasons.

Q4 What was the main reason why you did not go on holiday in 2011?

	Financial reasons	Personal/private reasons
EU27	45%	23%
Sex		
Male	42%	21%
Female	47%	25%
Age		
15-24	39%	17%
25-39	52%	16%
40-54	55%	20%
55 +	37%	30%
Education (End of)		
15-	48%	24%
16-19	48%	21%
20+	39%	26%
Still studying	30%	15%
Subjective urbanisation		
Rural village	44%	22%
Small/ Mid-size town	46%	22%
Large town	45%	26%
Respondent occupation scale		
Self-employed	36%	18%
Employee	44%	22%
Manual workers	56%	12%
Not working	44%	26%

Base: 28% from the total number of respondents (7 342 respondents)

(Those who didn't travelled in 2011)

4.2   Impact of the current economic situation on the holidays planned for 2012

- Three quarters of EU respondents are planning to go on holiday in 2012, but a third have changed their holiday plans on account of the economy –

Altogether, nearly three quarters (73%) respondents are planning to go on holiday in 2012. Four out of 10 (40%) said that they were planning to go on holiday and had not changed their plans. A third (33%) said that they were going on holiday but that they had changed their plans: of these, 22% said they would go on holiday but spend less; 12% said they would go on holiday but for a shorter period; and 4% said they would go on holiday but would change their destination.

Just under a fifth (18%) of respondents said that they were not going on holiday. Around a tenth (9%) said that they didn't know what their holiday plans were: of these, 6% said spontaneously that they had not yet made holiday plans for 2012, and 3% answered simply 'don't know'. A further 3% of respondents said spontaneously that they do not go on holidays.

Q15(2). Has the current economic situation had an impact on your holiday plans for 2012?

● I am going on holiday
● I am going on holiday but changed my plans
● I am not going on holiday
● Don't know

● EU27
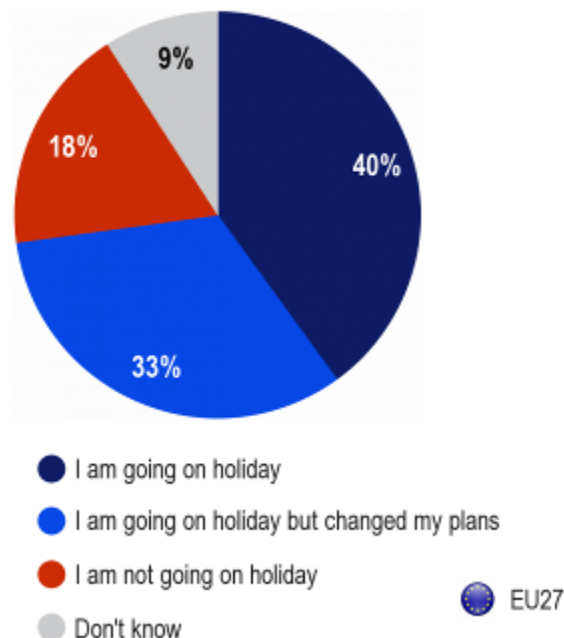
Base: Total number of respondents

There is a notable difference between the responses of EU15 citizens and their NMS12 counterparts on this question. While 42% of EU15 respondents said that they were going on holiday in 2012 and had not changed their plans, only 32% of people in the NMS12 gave this response. (do not use acronyms, please)

In almost all surveyed countries a majority of respondents said that they were planning to go on holiday in 2012. In 10 countries at least 80% of respondents plan to go on holiday, with the highest proportions of people saying this occurring in Denmark (89%), Finland (89%), Germany (87%), Norway (87%) and Austria (86%). The three countries where less than half of respondents said they were planning a holiday are Turkey (43%), Malta (45%) and Serbia (45%).

In five countries, at least three out of 10 people said that they were not planning to go on holiday in 2012: Turkey (45%), Portugal (40%), Greece (35%), Serbia (34%) and Bulgaria (30%). Relatively high numbers of people said they did not know about their 2012 holiday plans in Malta (28%), Israel (24%), Estonia (23%), Serbia (21%) and Macedonia (20%).

In 24 countries at least 30% of respondents say that they intend to go on holiday but that they have changed their plans in light of the economic situation. In Ireland, a majority (56%) of respondents give this answer (vs. 28% whose holiday plans are unchanged), followed by 49% in Croatia (where 23% say they holiday plans are unchanged), and 48% in Greece (where only 6% say their holiday plans remain unchanged).

Q15(2). Has the current economic situation had an impact on your holiday plans for 2012?

Don't know values (top): 6% 4% 6% 6% 11% 11% 6% 8% 7% 8% 9% 9% 12% 10% 23% 10% 10% 9% 28% 6% 10% 8% 19% 19% 14% 10% 9% 11% 17% 7% 20% 12% 11% 21% 24%

I am not going on holiday (red): 5% 7% 7% 8% 5% 9% 8% 11% 14% 18% 18% 18% 20% 21% 14% 18% 20% 18% 10% 30% 25% 14% 22% 24% 27% 40% 35% 21% 6% 25% 45% 2% 14% 34% 16%

I am going on holiday but changed my plans (blue): 15% 17% 16% 17% 19% 21% 33% 35% 35% 34% 33% 33% 29% 31% 27% 37% 37% 40% 56% 37% 45% 46% 38% 42% 43% 39% 48% 23% 40% 49% 37% 30% 73% 21% 37%

I am going on holiday (dark blue): 74% 72% 71% 69% 65% 59% 53% 46% 44% 40% 40% 40% 39% 38% 36% 35% 33% 33% 30% 28% 23% 22% 21% 21% 20% 20% 12% 6% 37% 23% 18% 13% 24% 23%

Additional values: 10% 27% 15% 39%

Countries: DK FI DE AT SE NL SI LU UK CZ EU27 PL BE LT EE FR SK LV MT IE BG ES CY HU IT RO PT EL IS HR MK TR NO RS IL

Legend:
- ■ I am going on holiday
- ■ I am going on holiday but changed my plans
- ■ I am not going on holiday
- ■ Don't know

Base: Total number of respondents

The socio-demographic data show that:

- Female respondents are slightly more likely to say they have changed their holiday plans than their male counterparts, by a margin of 35% to 32%.

- Younger respondents were the most likely to say that they were planning to go on holiday: while 85% of 15-24 year-olds said they would go on holiday, this falls to 65% among people over the age of 55. People in the 15-24 category were also the most likely to say that they have changed their holiday plans: 42% said this, compared with 24% of respondents over 55.

- While 81% of respondents who left education aged 20 or over said they were planning to go on holiday in 2012, this dips to 72% among people who left school aged 16-19, and again to 51% among those who left aged 15 or under. Among the 15- and 16-19 groups the numbers of people saying that their holiday plans are unchanged (27% and 37% respectively) are similar to the numbers saying they have changed their plans (24% and 35% respectively). However, this is not the case among respondents who left education aged 20 or over: of these, 47% say their plans remain unchanged, while only 34% say they have changed their holiday plans.

- Employees (84%) were more likely than self-employed respondents (78%), manual workers (73%) and people who are not working (65%) to say that they are planning to go on holiday. Employees (47%) and self-employed respondents (45%) were also the most likely to say that their plans had not changes, whereas only 36% of manual workers and 35% of people who are not working said this.

Q15A Has the current economic situation had an impact on your holiday plans for 2012?
(3 ANSWERS POSSIBLE)

	Are going on holiday	Are going on holiday but changed their plans	Are not going on holiday	DK/NA
EU27	40%	33%	18%	9%
Sex				
Male	44%	32%	15%	9%
Female	36%	35%	20%	9%
Age				
15-24	43%	42%	8%	7%
25-39	40%	38%	14%	8%
40-54	38%	36%	17%	9%
55 +	41%	24%	24%	11%
Education (End of)				
15-	27%	24%	36%	13%
16-19	37%	35%	19%	9%
20+	47%	34%	11%	8%
Still studying	45%	42%	6%	7%
Subjective urbanisation				
Rural village	42%	30%	20%	8%
Small/ Mid-size town	39%	34%	17%	10%
Large town	40%	35%	16%	9%
Respondent occupation scale				
Self-employed	45%	33%	14%	8%
Employee	47%	37%	9%	7%
Manual workers	36%	37%	18%	9%
Not working	35%	30%	24%	11%

Base: Total number of respondents

5. HOLIDAYS PLANNED FOR 2012

The final chapter of the report analyses the holiday plans that respondents have made for 2012. First, respondents were asked how long they were planning to go away on holiday for this year, if indeed they were planning to go away at all. And secondly, respondents were asked where they were intending to travel to for their upcoming holiday.

5.1   Duration of holidays planned in 2012

- Four out of 10 respondents expect to take a holiday lasting between four and 13 consecutive nights in 2012 –

Four out of 10 (41%) respondents said that they planned to take a holiday lasting between four and 13 consecutive nights, while just over a quarter (27%) said that they intended to make a short-stay trip of up to three nights. Around a fifth (19%) said that they planned to take a holiday lasting more than 13 consecutive nights. In addition, 15% of respondents said spontaneously that they were not planning to take any trips, with 12% saying spontaneously that they had not yet made any decisions.

Q13. In 2012, which of the following type of holidays do you plan to take?

Holidays between 4 and 13 consecutive nights	41%
Short-stay trip (up to 3 nights)	27%
Holidays with more than 13 consecutive nights	19%
No trip at all (DO NOT READ OUT)	15%
No decisions yet (DO NOT READ OUT)	12%
Don't know	2%
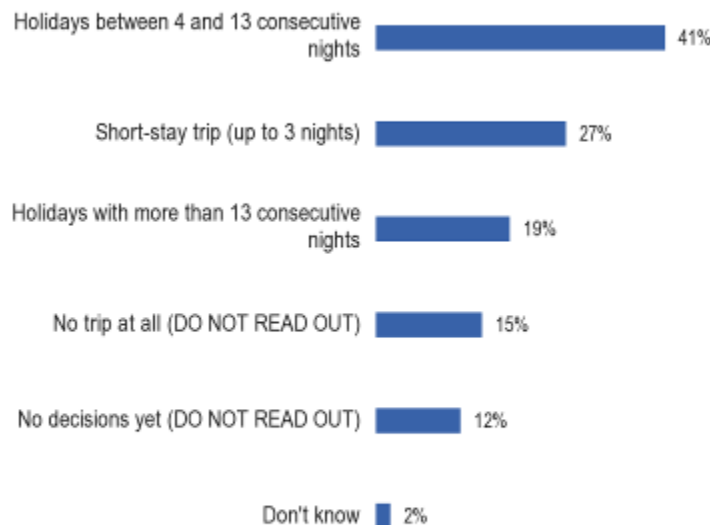
EU27

Base: Total number of respondents

In all but six of the 34 countries included in the survey the most popular answer to this question was 'a holiday of between four and 13 consecutive nights'. In six countries a majority of respondents gave this answer: Norway (55%), Slovenia (55%), the UK (55%), Denmark (53%), Ireland (52%) and the Czech Republic (50%). Relatively few people said they were planning a holiday of this duration in Greece (23%), Turkey (23%), Hungary (24%), Latvia (24%) and Serbia (24%).

In the six countries where 'a holiday of between four and 13 consecutive nights' was not the most popular response, 'a short-stay trip of up to three nights' was the answer most commonly given. They are: Latvia (42%), Turkey (36%), Lithuania (35%), Israel (29%), Greece (28%) and Portugal (28%). However, an even higher proportion of people said they were planning a short-stay trip in Finland (44%) and the UK (43%). Relatively few respondents said they were planning to take this kind of holiday in Serbia (5%), Malta (11%) and Macedonia (15%).

Over a quarter of respondents said they were planning to take a holiday lasting more than 13 consecutive nights in five countries: the Netherlands (39%), Norway (35%), Luxembourg (29%), France (26%) and the UK (26%). But relatively few respondents said they expected to take this kind of holiday in Hungary (4%), Bulgaria (5%) and Malta (7%).

Q13 In 2012, which of the following type of holidays do you plan to take?

	Holidays between 4 and 13 consecutive nights	Short-stay trip (up to 3 nights)	Holidays with more than 13 consecutive nights
EU27	41%	27%	19%
BE	43%	26%	18%
BG	34%	31%	5%
CZ	50%	26%	12%
DK	53%	22%	20%
DE	46%	25%	23%
EE	29%	24%	11%
IE	52%	33%	23%
EL	23%	28%	10%
ES	32%	28%	15%
FR	38%	17%	26%
IT	34%	16%	13%
CY	39%	16%	11%
LV	24%	42%	10%
LT	32%	35%	9%
LU	40%	16%	29%
HU	24%	33%	4%
MT	32%	11%	7%
NL	48%	30%	39%
AT	45%	28%	19%
PL	40%	32%	14%
PT	27%	28%	11%
RO	33%	31%	9%
SI	55%	22%	17%
SK	45%	21%	10%
FI	48%	44%	18%
SE	49%	30%	24%
UK	55%	43%	26%
HR	39%	29%	15%
TR	23%	36%	11%
MK	37%	15%	13%
IS	36%	19%	15%
NO	55%	31%	35%
RS	24%	5%	8%
IL	29%	29%	14%

Highest percentage per country	*Lowest percentage per country*
Highest percentage per item	Lowest percentage per item

Base: Total number of respondents

According to the socio-demographic data:

- Respondents aged 15-39 (46%) are more likely than those aged 55 or over (33%) to be planning a trip lasting between four and 13 nights. Those aged 15-39 (33-34%) are also more likely to be planning a short –stay trip than those aged 55 or over (20%).

- Individuals who finished their education aged 20 or over are more likely than those who left school at a younger age to be planning short-stay trips (47%), holidays of between four and 13 nights (20%) and holidays lasting more than 13 nights (22%).

- Employees (50%) are more likely than self-employed respondents (44%), manual workers (40%) and people who are not working (34%) to be planning a trip lasting between four and 13 nights.

Q13 In 2012, which of the following type of holidays do you plan to take? (MULTIPLE ANSWER POSSIBLE)

	Holidays between 4 and 13 consecutive nights	Short-stay trip (up to 3 nights)	Holidays with more than 13 consecutive nights
EU27	41%	27%	19%
Sex			
Male	42%	28%	20%
Female	39%	27%	18%
Age			
15-24	46%	33%	19%
25-39	46%	34%	16%
40-54	43%	28%	20%
55 +	33%	20%	20%
Education (End of)			
15-	26%	16%	13%
16-19	39%	28%	18%
20+	47%	30%	22%
Still studying	50%	31%	20%
Subjective urbanisation			
Rural village	40%	27%	16%
Small/ Mid-size town	40%	27%	19%
Large town	43%	29%	21%
Respondent occupation scale			
Self-employed	44%	32%	21%
Employee	50%	31%	21%
Manual workers	40%	30%	15%
Not working	34%	24%	17%

Base: Total number of respondents

5.2   Destinations chosen for 2012

- Over half of respondents who were planning to take a holiday in 2012 intended to go somewhere in their own country –

A majority (52%) of respondents said that they planned to spend their holidays in their own country, while 37% said that they intended to go on holiday in the EU. Just under a quarter (23%) of respondents said that they planned to go on holiday in another country outside the EU, while 7% said they didn't know where they were going to spend their holiday. (Compare to last year or previous years….)

Q14. In which country(ies) do you plan to spend your holidays in 2012?
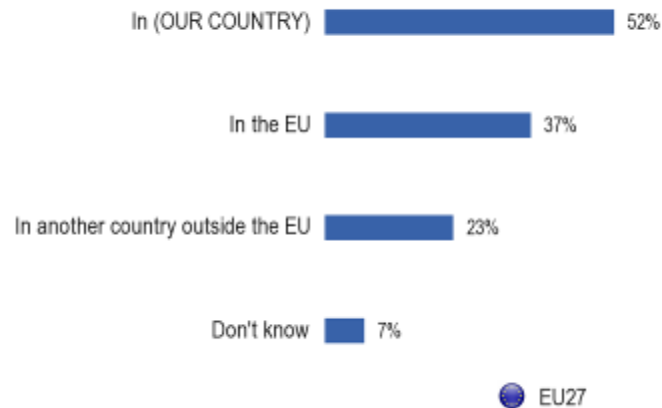
In (OUR COUNTRY)	52%
In the EU	37%
In another country outside the EU	23%
Don't know	7%

EU27

Base: 71% from the total number of respondents (18 800 respondents)
(Those who want to take holidays in 2012)
When asking the question (OUR COUNTRY) is replaced by the name of the country the interview is conducted

In terms of the specific countries in which respondents said they were planning to spend their holidays, the most popular intended destinations were Spain (10%), Italy (7%), France (6%), Greece (4%), Austria (3%), Germany (3%) and the UK (3%).

Q14. In which country(ies) do you plan to spend your holidays in 2012?
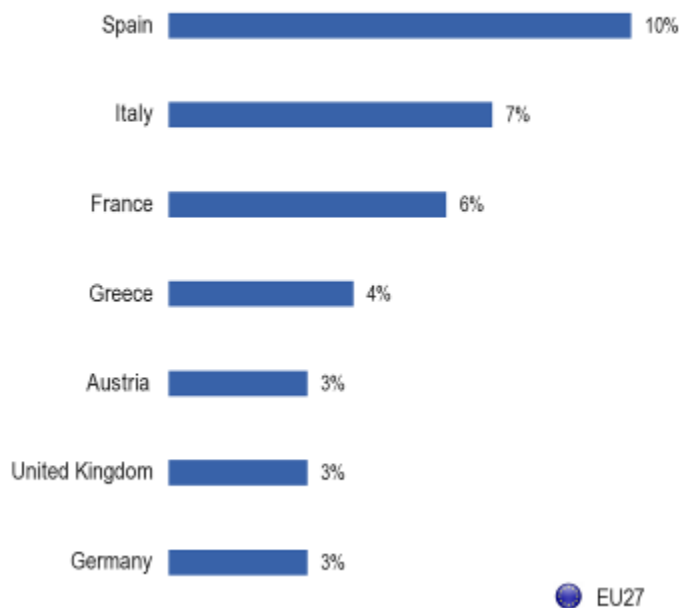
Spain — 10%
Italy — 7%
France — 6%
Greece — 4%
Austria — 3%
United Kingdom — 3%
Germany — 3%
● EU27

Base: 71% from the total number of respondents (18 800 respondents)
(Those who want to take holidays in 2012)

Interpreting these results slightly differently by incorporating all the 'in my country' responses into the 'in the EU' category, we find that 79% of EU respondents who said they would go on holiday in 2012 planned to go on holiday within the EU. When removing 'in my country' from the list of responses, the results also look a little different in terms of the specific countries that respondents said they were intending to go to. Now, 16% said that they would go to Spain, 13% to France, 13% to Italy, 10% to Germany and 9% to the UK.

At individual country level, in 14 of the 34 countries included in the survey the majority of respondents said that they planned to holiday **in their own country** in 2012. This plan was commonest in Greece (80%), Turkey (80%), Croatia (77%) and Bulgaria (73%). Relatively few respondents said they expected to holiday domestically in Luxembourg (2%) and Malta (3).

EL	80%
BG	73%
ES	68%
PL	66%
PT	63%
HU	63%
IT	60%
FR	58%
RO	57%
LT	53%
SE	53%
EU	52%
FI	49%
AT	47%
CZ	45%
SK	43%
UK	42%
DE	42%
EE	40%
LV	38%
DK	35%
SI	30%
IE	30%
CY	30%
NL	26%
BE	13%
MT	3%
LU	2%
TR	80%
HR	77%
IS	50%
MK	26%
NO	36%
RS	33%
IL	31%

Question: Q14. In which country(ies) do you plan to spend your holidays in 2012?

Answers: In (OUR COUNTRY)

Map Legend

■ 56% - 100%
■ 49% - 55%
□ 0% - 48%

Base: 71% from the total number of respondents (18 800 respondents)
(Those who want to take holidays in 2012)

In 10 countries a majority of respondents said that they intended to take their holiday somewhere **in the EU**, with this being a particularly common response among people in Luxembourg (80%), Cyprus (72%), Malta (70%), Belgium (65%) and Denmark (60%). Holidaying in the EU was a relatively uncommon plan in Turkey (11%), France (19%) and Greece (20%).

LU	80%	
CY	72%	
MT	70%	
BE	65%	
DK	60%	
IE	59%	
NL	59%	
LV	54%	
DE	53%	
SE	46%	
AT	45%	
SK	45%	
FI	44%	
UK	43%	
EE	43%	
CZ	41%	
EU	37%	
RO	36%	
LT	35%	
HU	30%	
PL	28%	
IT	26%	
PT	25%	
SI	25%	
BG	21%	
ES	21%	
EL	20%	
FR	19%	
IS	46%	
MK	31%	
HR	25%	
TR	11%	
NO	51%	
RS	36%	
IL	33%	

Question: Q14. In which country(ies) do you plan to spend your holidays in 2012?

Answers: In the EU
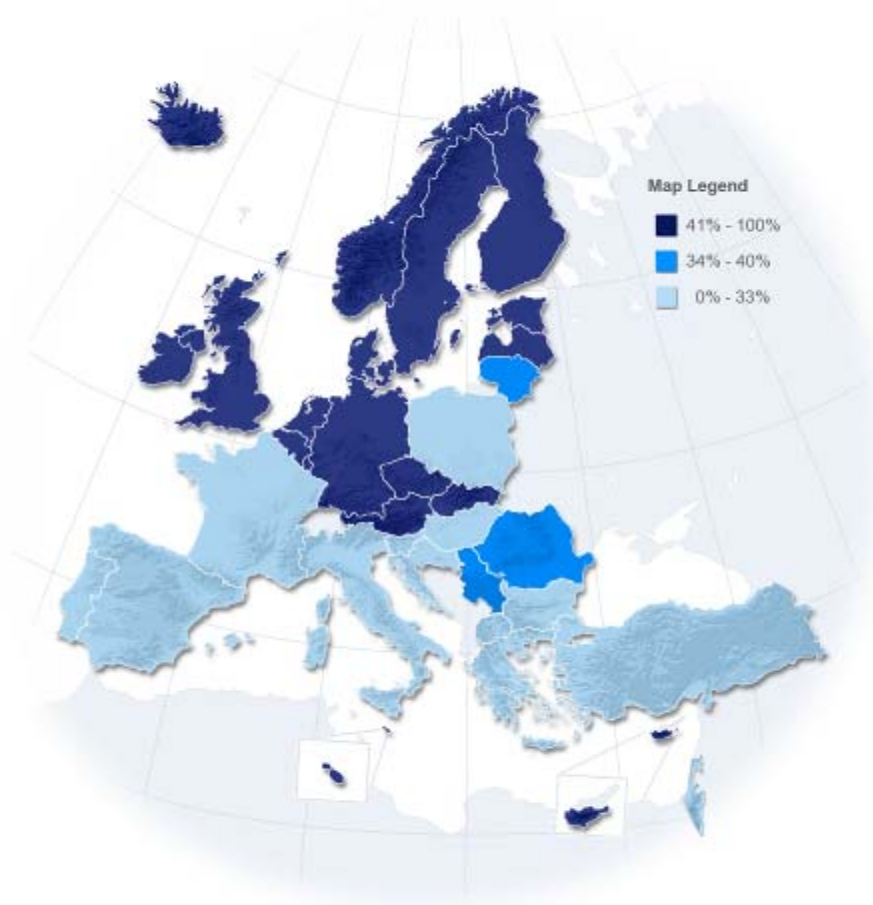
Map Legend
- 41% - 100%
- 34% - 40%
- 0% - 33%

Base: 71% from the total number of respondents (18 800 respondents)
(Those who want to take holidays in 2012)

In nine countries at least three out of 10 respondents said that they planned to take a holiday in a country **outside the EU**. This plan was most popular in Slovenia (55%), Serbia (41%), Macedonia (37%), Austria (34%), Denmark (34%) and Germany (33%). However, relatively few respondents said they were planning a holiday in a non-EU country in Cyprus (8%), Greece (8%), Hungary (9%) and Romania (9%).

SI	55%	
DK	34%	
AT	34%	
DE	33%	
SE	31%	
UK	31%	
NL	29%	
BE	28%	
EE	26%	
LU	24%	
CZ	24%	
EU	23%	
FR	22%	
IE	21%	
FI	20%	
LT	19%	
LV	19%	
SK	18%	
IT	16%	
PT	15%	
PL	14%	
MT	14%	
ES	13%	
BG	10%	
RO	9%	
HU	9%	
EL	8%	
CY	8%	
MK	37%	
IS	26%	
HR	15%	
TR	11%	
RS	41%	
NO	30%	
IL	27%	

Question: Q14. In which country(ies) do you plan to spend your holidays in 2012?

Answers: In another country outside the EU

Map Legend
- 26% - 100%
- 21% - 25%
- 0% - 20%

Base: 71% from the total number of respondents (18 800 respondents)
(Those who want to take holidays in 2012)

Destinations chosen for 2012

BE
- In the EU — 65%
- In another country outside the EU — 28%
- In (OUR COUNTRY) — 13%

NL
- In the EU — 59%
- In (OUR COUNTRY) — 26%
- In another country outside the EU — 29%

BG
- In (OUR COUNTRY) — 73%
- In the EU — 21%
- In another country outside the EU — 10%

AT
- In the EU — 45%
- In (OUR COUNTRY) — 47%
- In another country outside the EU — 34%

CZ
- In (OUR COUNTRY) — 45%
- In the EU — 41%
- In another country outside the EU — 24%

PL
- In (OUR COUNTRY) — 66%
- In the EU — 28%
- In another country outside the EU — 14%

DK
- In the EU — 60%
- In (OUR COUNTRY) — 45%
- In another country outside the EU — 34%

PT
- In (OUR COUNTRY) — 63%
- In the EU — 25%
- In another country outside the EU — 15%

DE
- In the EU — 53%
- In (OUR COUNTRY) — 42%
- In another country outside the EU — 33%

RO
- In (OUR COUNTRY) — 57%
- In the EU — 36%
- In another country outside the EU — 9%

EE
- In the EU — 43%
- In (OUR COUNTRY) — 40%
- In another country outside the EU — 26%

SI
- In another country outside the EU — 55%
- In the EU — 25%
- In (OUR COUNTRY) — 30%

IE
- In the EU — 59%
- In (OUR COUNTRY) — 30%
- In another country outside the EU — 21%

SK
- In (OUR COUNTRY) — 43%
- In the EU — 45%
- In another country outside the EU — 18%

EL
- In (OUR COUNTRY) — 80%
- In the EU — 20%
- In another country outside the EU — 8%

FI
- In (OUR COUNTRY) — 49%
- In the EU — 44%
- In another country outside the EU — 20%

ES
- In (OUR COUNTRY) — 68%
- In the EU — 21%
- In another country outside the EU — 13%

SE
- In (OUR COUNTRY) — 53%
- In the EU — 46%
- In another country outside the EU — 31%

FR
- In (OUR COUNTRY) — 58%
- In the EU — 19%
- In another country outside the EU — 22%

UK
- In the EU — 43%
- In (OUR COUNTRY) — 42%
- In another country outside the EU — 31%

IT
- In (OUR COUNTRY) — 60%
- In the EU — 26%
- In another country outside the EU — 16%

HR
- In (OUR COUNTRY) — 77%
- In the EU — 25%
- In another country outside the EU — 15%

CY
- In the EU — 72%
- In (OUR COUNTRY) — 30%
- In another country outside the EU — 8%

TR
- In (OUR COUNTRY) — 80%
- In another country outside the EU — 11%
- In the EU — 11%

LV
- In the EU — 54%
- In (OUR COUNTRY) — 38%
- In another country outside the EU — 19%

MK
- In (OUR COUNTRY) — 26%
- In the EU — 31%
- In another country outside the EU — 37%

LT
- In (OUR COUNTRY) — 53%
- In the EU — 35%
- In another country outside the EU — 19%

IS
- In (OUR COUNTRY) — 50%
- In the EU — 46%
- In another country outside the EU — 26%

LU
- In the EU — 80%
- In another country outside the EU — 24%
- In (OUR COUNTRY) — 2%

NO
- In the EU — 51%
- In (OUR COUNTRY) — 36%
- In another country outside the EU — 30%

HU
- In (OUR COUNTRY) — 63%
- In the EU — 30%
- In another country outside the EU — 9%

RS
- In another country outside the EU — 41%
- In (OUR COUNTRY) — 33%
- In the EU — 36%

MT
- In the EU — 70%
- In another country outside the EU — 14%
- In (OUR COUNTRY) — 3%

IL
- In the EU — 33%
- In (OUR COUNTRY) — 31%
- In another country outside the EU — 27%

In terms of the specific countries that people said they were intending to travel to, **Spain** was the most popular planned destination for the respondents in Ireland (26%), Norway (18%) and the UK (18%).

Italy was most chosen by the respondents in Malta (30%) and Austria (21%), while **France** by respondents in Belgium (35%), Luxembourg (22%) and the Netherlands (18%).

Greece was planned as destination for the 2012 holidays mostly by respondents in Cyprus (36%) and Republic of Serbia (19%).
Austria was the most popular destination among respondents in Hungary (6%) and Croatia (5%), although a higher proportion of people in Germany (10%) and the Netherlands (8%) said that they were planning a holiday there.

Relatively high number of respondents in the Netherlands (12%) and Luxembourg (10%) said they were planning to holiday in **Germany**, while **the UK** was a particularly popular option among respondents in Malta (27%), Ireland (14%), Cyprus (12%) and Latvia (10%).

Considering the individual country results when the 'in my country' responses are folded into the 'in the EU' category, we find that a majority of respondents in all 27 EU countries, and also Norway, said that they would holiday in the EU. This response was most prevalent in Greece (95%), Bulgaria (89%) and Cyprus (89%). Unsurprisingly, holidaying in the EU was a less popular option among non-EU countries, and in particular in Turkey (11%), Croatia (25%) and Macedonia (31%).

Cross-referencing the results of this question with the earlier question which asked respondents who went away for at least four nights in 2011 where they went on holiday, we find that 69% of people who said they holidayed in their own country in 2011 planned to do the same in 2012. However, 30% of people who holidayed in their own country last year planned to go to an EU country for their holiday in 2012, while 17% of people in this group intended to go to another country outside the EU.

Among respondents who said they spent at least four nights on holiday in another EU country in 2011, 61% said they planned to do the same again in 2012. Just 30% said they would holiday in their own country, with the same number saying they would travel to a country outside the EU for their holiday this year.

A majority (54%) of respondents who said they holidayed in a country outside the EU in 2011 said they would do the same thing again in 2012. However, over four out of 10 (42%) of the people in this group said that they would go on holiday in the EU, while a quarter (26%) said that they would holiday in their own county.

When the 'in my country' responses are folded into the 'in the EU' category, we find that 82% of respondents who said they holiday in the EU in 2011 intended to do the same thing again in 2012.

Q14 In which country(ies) do you plan to spend your holidays in 2012?

		Spain	Italy	France	Greece	Austria	Germany	United Kingdom
	EU27	10%	7%	6%	4%	3%	3%	3%
	BE	17%	9%	**35%**	4%	2%	6%	*2%*
	BG	2%	3%	3%	**11%**	*1%*	*1%*	*1%*
	CZ	5%	**11%**	4%	6%	4%	4%	*3%*
	DK	**17%**	13%	10%	*5%*	6%	10%	7%
	DE	**15%**	14%	6%	3%	10%	0%	2%
	EE	**5%**	4%	3%	*1%*	*1%*	4%	2%
	IE	**26%**	7%	11%	2%	2%	3%	14%
	EL	2%	**4%**	3%	0%	2%	3%	2%
	ES	0%	**5%**	**5%**	1%	1%	3%	4%
	FR	**7%**	3%	0%	1%	1%	2%	2%
	IT	**8%**	0%	6%	5%	1%	3%	2%
	CY	8%	8%	7%	**36%**	2%	3%	12%
	LV	6%	6%	5%	1%	2%	5%	**10%**
	LT	**7%**	4%	2%	1%	2%	6%	6%
	LU	15%	16%	**22%**	1%	8%	10%	3%
	HU	*2%*	**6%**	2%	**6%**	**6%**	4%	*2%*
	MT	3%	**30%**	8%	2%	2%	4%	27%
	NL	12%	13%	**18%**	4%	8%	12%	*4%*
	AT	8%	**21%**	4%	4%	0%	8%	2%
	PL	**5%**	**5%**	2%	3%	2%	3%	4%
	PT	**14%**	4%	7%	0%	*1%*	*1%*	*1%*
	RO	6%	**10%**	4%	6%	3%	5%	2%
	SI	3%	**8%**	4%	3%	5%	2%	*1%*
	SK	5%	**10%**	3%	7%	4%	2%	*1%*
	FI	**10%**	4%	5%	4%	*1%*	6%	2%
	SE	**12%**	8%	7%	5%	2%	6%	4%
	UK	**18%**	4%	10%	6%	*1%*	2%	0%
	HR	3%	**5%**	2%	1%	**5%**	3%	2%
	TR	2%	2%	**3%**	1%	*1%*	**3%**	*1%*
	MK	3%	3%	1%	**13%**	3%	3%	0%
	IS	**15%**	6%	4%	2%	*1%*	7%	9%
	NO	**18%**	7%	7%	5%	*1%*	2%	6%
	RS	2%	3%	1%	**19%**	3%	5%	0%
	IL	5%	**7%**	**7%**	2%	3%	5%	3%

Highest percentage per country	*Lowest percentage per country*
Highest percentage per item	Lowest percentage per item

Base: 71% from the total number of respondents (18 800 respondents)
(Those who want to take holidays in 2012)

According to the socio-demographic data:

- Older respondents were more likely to say that they were planning to holiday in their own country: 57% of over-55s gave this answer, compared with 41% of 15-24 year-olds. People in the latter group were the most likely to say that they were holidaying in the EU.

- Respondents who left education aged 15 or under (62%) were more likely than those who left aged 16-19 (54%) or aged 20 or over (50%) to say that they were planning to holiday in their own country. By contrast, individuals who spent longer in education were more likely to have been planning a holiday in the EU or in a non-EU country.

- People who are not working (55%) and manual workers (54%) were more likely than employees (48%) or self-employed people (47%) to say that they were planning to holiday in their own country. By contrast, employees and self-employed respondents were more likely to have been planning a holiday in the EU or in a country outside the EU.

Q14 In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

	In [OUR COUNTRY]	In the EU	In another country outside the EU	Don't know
EU27	52%	37%	23%	7%
Sex				
Male	51%	37%	23%	7%
Female	52%	36%	22%	7%
Age				
15-24	41%	42%	24%	8%
25-39	52%	35%	23%	9%
40-54	53%	37%	23%	7%
55 +	57%	36%	22%	5%
Education (End of)				
15-	62%	28%	15%	4%
16-19	54%	35%	22%	6%
20+	50%	39%	25%	8%
Still studying	42%	41%	23%	8%
Subjective urbanisation				
Rural village	54%	37%	21%	6%
Small/ Mid-size town	52%	36%	23%	7%
Large town	50%	38%	24%	8%
Respondent occupation scale				
Self-employed	47%	40%	26%	8%
Employee	48%	40%	25%	8%
Manual workers	54%	31%	23%	7%
Not working	55%	34%	20%	6%

Base: 71% from the total number of respondents (18 800 respondents)
(Those who want to take holidays in 2012)

CONCLUSIONS

Holidays might be viewed as a luxury by some respondents; or, for respondents experiencing pressure on their level of income or simply concerned by the future state or the economy, a holiday could well be looked upon as something that might be sacrificed for the time being.

With the latest wave of this Flash Eurobarometer on attitudes to tourism having been conducted in the context of adverse economic conditions in Europe, it was therefore important to assess the extent to which Europeans might have curtailed their travel in 2011, or might be planning to alter their plans for 2012, on account of the economic context

It was encouraging to find that the proportion of EU citizens who went away in 2011 (72%) remained unchanged from last year's survey, which was conducted on a smaller sample. Moreover, confidence appears not to have been dented regarding the year ahead, with 73% of EU respondents voicing their intention to go on holiday in 2012. Although EU citizens are feeling the impact of the economic crisis, many people have decided to alter their holiday plans for 2012 rather than abandon their holidays altogether: 33% of EU respondents said that they would still go on holiday in 2012 but they had changed their plans in order to take the economic conditions into account.

This sentiment is arguably reflected in the details of respondents' 2012 holiday plans. Many people are naturally inclined to repeat, to a great or lesser extent, a prior holiday experience. However, this year's survey suggests that more respondents who holidayed domestically in 2011 plan to do so again in 2012 than respondents who holidayed in another EU country; and they, in turn, appear more likely to repeat their experience than respondents who holidayed in a country outside the EU. If holidays outside the EU can be assumed to be the most expensive for EU citizens, and domestic holidays can on the whole be assumed to be the cheapest, then it is reasonable to conclude that the negative economic outlook is persuading more people to repeat relatively cheap holidays than relatively expensive ones.

It is also unsurprising to find that the impact of the EU's current economic problems is not uniform across the EU. For example, in Portugal and Greece, two of the Member States worst hit by the economic downturn, relatively high numbers of respondents – 40% and 35% respectively – said that they would not go on holiday at all in 2012. Similarly, in some EU countries – notably Bulgaria (71%), Greece (70%) and Hungary (66%) – a majority of people who did not go on holiday last year said that the reasons for this were financial (compared with an EU average of 45%), whereas in other countries money tended not to be the reason for staying at home.

It is clear that the appeal of holidaying in the EU remains strong. Almost nine out of 10 (89%) EU citizens who went on holiday for at least four nights in 2011 went on holiday within the EU (including in their own country). If indeed more EU citizens favour domestic holidays and holidays close to home as a result of the economic downturn, the proportion of EU respondents holidaying within the EU can be expected to hold firm in the short to medium term, if not increase. This conclusion is reinforced by the high level of satisfaction registered by people who went on holiday in 2011, with 94% satisfied with the natural features of their holiday destination, and 93% satisfied with the quality of accommodation. If approximately 90% people spend their holidays in the EU and around 90% of holidaymakers are expressing satisfaction, then it automatically follows that the proportion of Europeans who choose to holiday within the EU will remain high.

Another important trend highlighted by this year's survey is the growing importance of the internet to travel planning. In 2011, a majority (53%) of people used the internet to arrange their holidays – far more than used travel agents, for example – while websites were second only to personal recommendations in terms of researching holidays and making decisions about what to book and where to go. Probably as a direct consequence of this online shift and the way in which it is empowering individual consumers, we also now find that half (49%) of those who went on holiday in 2011 organised the various elements of their trip separately, rather than booking them altogether in one package.

The shift online may also be related to fact that most Europeans continue to go on holiday in spite of the economic conditions. The ability to research and find good deals online no doubt gives individuals more confidence that if they do decide to go on holiday, they will be able to find the right transport and accommodation options to fit their budget.

ANNEXES

TECHNICAL SPECIFICATIONS

FLASH EUROBAROMETER 334
"Attitudes towards tourism"
TECHNICAL SPECIFICATIONS

Between the 10th and 14th of January 2012, TNS Political & Social, a consortium created between TNS political & social, TNS UK and TNS opinion, carried out the survey FLASH EUROBAROMETER 334 about 'Attitudes toward tourism'.

This survey has been requested by the EUROPEAN COMMISSION, Directorate-General for Enterprise and Industry. It is a general public survey co-ordinated by the Directorate-General for Communication ("Research and Speechwriting" Unit). The FLASH EUROBAROMETER 334 covers the population of the respective nationalities of the European Union Member States, resident in each of the 27 Member States and aged 15 years and over. It was also conducted in Croatia, Turkey, FYROM, Iceland, Norway, Republic of Serbia and Israel. The survey covers the national population of citizens (in these countries) as well as the population of citizens of all the European Union Member States that are residents in these countries and have a sufficient command of the national languages to answer the questionnaire. All interviews were carried using the TNS e-Call center (our centralized CATI system). In every country respondents were called both on fixed lines and mobile phones. The basic sample design applied in all states is multi-stage random (probability). In each household, the respondent was drawn at random following the "last birthday rule".

TNS have developed their own RDD sample generation capabilities based on using contact telephone numbers from responders to random probability or random location face to face surveys, such as Eurobarometer, as seed numbers. The approach works because the seed number identifies a working block of telephone numbers and reduces the volume of numbers generated that will be ineffective. The seed numbers are stratified by NUTS2 region and urbanisation to approximate a geographically representative sample. From each seed number the required sample of numbers are generated by randomly replacing the last two digits. The sample is then screened against business databases in order to exclude as many of these numbers as possible before going into field. This approach is consistent across all countries.

ABBR.	COUNTRIES	INSTITUTES	N° INTERVIEWS	FIELDWORK DATES		POPULATION 15+
BE	Belgium	TNS Dimarso	1.002	10/01/2012	14/01/2012	8.939.546
BG	Bulgaria	TNS BBSS	1.000	10/01/2012	14/01/2012	6.537.510
CZ	Czech Rep.	TNS Aisa s.r.o	1.000	10/01/2012	14/01/2012	9.012.443
DK	Denmark	TNS Gallup A/S	1.000	10/01/2012	14/01/2012	4.561.264
DE	Germany	TNS Infratest	1.500	10/01/2012	14/01/2012	64.409.146
EE	Estonia	TNS Emor	500	10/01/2012	14/01/2012	945.733
EL	Greece	TNS ICAP	1.002	10/01/2012	14/01/2012	8.693.566
ES	Spain	TNS Demoscopia S.A	1.501	10/01/2012	14/01/2012	39.035.867
FR	France	TNS Sofres	1.502	10/01/2012	14/01/2012	47.756.439
IE	Ireland	IMS Millward Brown	1.000	10/01/2012	14/01/2012	3.522.000
IT	Italy	TNS Infratest	1.501	10/01/2012	14/01/2012	51.862.391
CY	Rep. of Cyprus	CYMAR	500	10/01/2012	14/01/2012	660.400
LV	Latvia	TNS Latvia	503	10/01/2012	14/01/2012	1.447.866
LT	Lithuania	TNS Lithuania	503	10/01/2012	14/01/2012	2.829.740
LU	Luxembourg	TNS Dimarso	502	10/01/2012	14/01/2012	404.907
HU	Hungary	TNS Hoffmann Kft	1.000	10/01/2012	14/01/2012	8.320.614
MT	Malta	MISCO International Ltd	501	10/01/2012	14/01/2012	335.476
NL	Netherlands	TNS NIPO	1.000	10/01/2012	14/01/2012	13.371.980
AT	Austria	TNS Austria	1.000	10/01/2012	14/01/2012	7.009.827
PL	Poland	TNS OBOP	1.501	10/01/2012	14/01/2012	32.413.735
PT	Portugal	TNS EUROTESTE	1.001	10/01/2012	14/01/2012	8.080.915
RO	Romania	TNS CSOP	1.003	10/01/2012	14/01/2012	18.246.731
SI	Slovenia	RM PLUS	500	10/01/2012	14/01/2012	1.759.701
SK	Slovakia	TNS AISA Slovakia	1.001	10/01/2012	14/01/2012	4.549.955
FI	Finland	TNS Gallup Oy	1.002	10/01/2012	14/01/2012	4.440.004
SE	Sweden	TNS SIFO	1.000	10/01/2012	14/01/2012	7.791.240
UK	United Kingdom	TNS UK	1.498	10/01/2012	14/01/2012	51.848.010
TOTAL EU27			**26.523**	**10/01/2012**	**14/01/2012**	**408.787.006**
HR	Croatia	Puls	503	10/01/2012	14/01/2012	3.749.400
TR	Turkey	TNS PIAR	1.000	10/01/2012	14/01/2012	54.844.406
MK	Former Yugoslav Rep. of Macedonia	TNS Brima	501	10/01/2012	14/01/2012	1.678.404
IS	Iceland	Capacent ehf	501	10/01/2012	14/01/2012	252.277
NW	Norway	TNS Gallup AS	500	10/01/2012	14/01/2012	3.886.395
IL	Israel	TNS Teleseker	563	10/01/2012	14/01/2012	4.257.500
RS	Republic of Serbia	TNS Medium Gallup	503	10/01/2012	14/01/2012	6.409.693
TOTAL			**30.594**	**10/01/2012**	**14/01/2012**	**473.833.379**

For each country a comparison between the sample and the universe was carried out. The Universe description was derived from Eurostat population data or from national statistics offices. For all countries surveyed, a national weighting procedure, using marginal and intercellular weighting, was carried out based on this Universe description. In all countries, gender, age, region and size of locality were introduced in the iteration procedure. For international weighting (i.e. EU averages), TNS Political & Social applies the official population figures as provided by EUROSTAT or national statistic offices. The total population figures for input in this post-weighting procedure are listed above.

Readers are reminded that survey results are <u>estimations</u>, the accuracy of which, everything being equal, rests upon the sample size and upon the observed percentage. With samples of about 1,000 interviews, the real percentages vary within the following confidence limits:

Observed percentages	10% or 90%	20% or 80%	30% or 70%	40% or 60%	50%
Confidence limits	± 1.9 points	± 2.5 points	± 2.7 points	± 3.0 points	± 3.1 points

QUESTIONNAIRE

FL334 - European's attitudes towards tourism

ASK ALL

Q1	During 2011, how many times have you travelled for business or private purposes, where you were away from home for a minimum of one night? (M)

INT.: IF "NO TRAVEL", CODE 000 - IF "DON'T KNOW", CODE 999

FL 328 Q1 MODIFIED

ASK Q2 AND Q3 IF RESPONDENTS SAY THAT THEY HAVE TRAVELLED MINIMUM ONE NIGHT, Q1>0 AND Q1< 999, OTHERS GO TO FILTER BEFORE Q4

Q2	And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:

(ONE ANSWER ONLY)

	(READ OUT)	1	2	3	4	5 times or more	None/ zero	DK/ NA
1	In paid accommodation (hotel/ rented apartment/house etc….)	1	2	3	4	5	6	7
2	In own property/ second home	1	2	3	4	5	6	7
3	At friends or relatives	1	2	3	4	5	6	7
4	On a camping site	1	2	3	4	5	6	7
5	In another type of location	1	2	3	4	5	6	7

NEW

Q3	Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:

(ONE ANSWER ONLY)

	(READ OUT)	1	2	3	4	5 times or more	None/ zero	DK/ NA
1	In paid accommodation (hotel/ rented apartment/house etc.…)	1	2	3	4	5	6	7
2	In own property/ second home	1	2	3	4	5	6	7
3	At friends or relatives	1	2	3	4	5	6	7
4	On a camping site	1	2	3	4	5	6	7
5	In another type of location	1	2	3	4	5	6	7

NEW

ASK Q4 ONLY IF THE RESPONDENT SAYS THAT HE OR SHE DID NOT STAY AWAY IN 2011, ((Q2.1=6 and Q2.2=6 and Q2.3=6 and Q2.4=6 and Q2.5=6 and Q3.1=6 and Q3.2=6 and Q3.3=6 and Q3.4=6 and Q3.5=6) OR Q1=0), OTHERS GO TO FILTER BEFORE Q5

PROG Q4: ROTATE CODES 1 TO 6

Q4	What was the main reason why you did not go on holiday in 2011?

(READ OUT – ONE ANSWER ONLY)

Personal/private reasons	1
Financial reasons	2
Lack of time	3
Concerns about safety	4
Preferred to stay at home or with family / friends	5
Problems of accessibility of transport or accommodation (N)	6
You did not want to go on holiday in 2011 (DO NOT READ OUT)	7
Other (DO NOT READ OUT)	8
DK/NA	9

FL 328 Q4 MODIFIED

2

ASK Q5 TO Q9 ONLY IF THE RESPONDENT SAYS THAT HE OR SHE STAYED AWAY FOR MINIMUM FOUR NIGHTS, Q3.1-5=1-5 FOR AT LEAST ONE ITEM, OTHERS GO TO Q10

| Q5 | In which country(ies) did you go for a minimum of 4 nights in 2011? |

(DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

IN YOUR COUNTRY	
In [OUR COUNTRY]	1,
OUTSIDE YOUR COUNTRY IN THE EUROPEAN UNION	
Austria	2,
Belgium	3,
Bulgaria	4,
Cyprus	5,
Czech Republic	6,
Denmark	7,
Estonia	8,
Finland	9,
France	10,
Germany	11,
Greece	12,
Hungary	13,
Ireland	14,
Italy	15,
Latvia	16,
Lithuania	17,
Luxembourg	18,
Malta	19,
Netherlands	20,
Poland	21,
Portugal	22,
Romania	23,
Slovakia	24,
Slovenia	25,
Spain	26,
Sweden	27,
United Kingdom	28,
IN ANOTHER COUNTRY OUTSIDE THE EUROPEAN UNION	
In another country outside the EU	29,
DK/NA	30,

NEW

PROG Q6: ROTATE CODES 1 TO 8

Q6	What were your main reasons for going on holidays in 2011?

(READ OUT – MAX. 3 ANSWERS)

Sun/beach	1,
Rest/recreation (including Wellness/health treatment) (M)	2,
Spending time with your family (N)	3,
City trips	4,
Sports-related (e.g. scuba-diving, cycling etc…) (M)	5,
Nature (mountain, lake, landscape etc…) (M)	6,
Culture / religion	7,
Visiting friends / relatives	8,
Other (DO NOT READ OUT)	9,
DK/NA	10,

FL 328 Q5 MODIFIED

Q7	How many times did you use the following means of transport to travel to your holiday destination in 2011…?

(INT. : One back and forth should be counted as ONE TIME - ONE ANSWER ONLY)

(READ OUT)	1	2	3	4	5 times or more	None/ zero	DK/ NA
1 Airplane	1	2	3	4	5	6	7
2 Boat	1	2	3	4	5	6	7
3 Train	1	2	3	4	5	6	7
4 Bus	1	2	3	4	5	6	7
5 Car/ Motorbikes	1	2	3	4	5	6	7

NEW BASED ON FL 328 Q6

Q8	In 2011, how many times did you go on any of the following types of holiday?

(ONE ANSWER ONLY)

(READ OUT)	1	2	3	4	5 times or more	None/ zero	DK/ NA
1	All Inclusive holiday (transport + accommodation + food)	1	2	3	4	5	6	7
2	Package Tour (transport + accommodation)	1	2	3	4	5	6	7
3	Segments of tourist service arranged separately (e.g. transport/accommodation)	1	2	3	4	5	6	7

NEW

PROG Q9: ROTATE CODES 1 TO 6

Q9	Did you arrange your holidays in 2011 using any of the following methods?

(READ OUT – MULTIPLE ANSWER POSSIBLE)

The Internet	1,
Over the phone	2,
Through a travel agency	3,
Through someone you know	4,
Over the counter of a transportation company (airline company, railway company etc…)	5,
On-site (place of holidays)	6,
Other (DO NOT READ OUT)	7,
DK/NA	8,

NEW

ASK ALL

PROG Q10: ROTATE CODES 1 TO 5

Q10 | Which of the following would make you go back to the same place for a holiday?

(READ OUT – MAX. 3 ANSWERS)

The quality of the accommodation	1,
The natural features (weather conditions, landscape, etc.)	2,
The general level of prices	3,
The activities offered (variety and comprehensiveness of the tourist offer)	4,
How tourists are welcomed (e.g. child friendliness, customer care, "pets-welcomed" policy, etc...)	5,
Other (DO NOT READ OUT)	6,
DK/NA	7,

NEW

ASK Q11 ONLY IF THE RESPONDENT SAYS THAT HE OR SHE STAYED AWAY FOR MINIMUM FOUR NIGHTS, Q3.1-5=1-5 FOR AT LEAST ONE ITEM, OTHERS GO TO Q12

Q11	Now thinking about your main holidays in 2011, how satisfied were you with…?

(ONE ANSWER ONLY)

	(READ OUT)	Very satisfied	Fairly satisfied	Not very satisfied	Not at all satisfied	DK/NA
1	The quality of the accommodation	1	2	3	4	5
2	The natural features (weather conditions, landscape, etc;)	1	2	3	4	5
3	The general level of prices	1	2	3	4	5
4	The activities offered (variety and comprehensiveness of the	1	2	3	4	5
5	How tourists are welcomed (e.g. child friendliness, customer care, "pets-welcomed" policy, etc)	1	2	3	4	5

NEW

ASK ALL

PROG Q12: ROTATE CODES 1 TO 8

| Q12 | From the following information sources, which one do you consider to be the most important when you make a decision about your travel plans? |

(READ OUT – MAX. 3 ANSWERS)

Personal experience	1,
Recommendations of friends, colleagues or relatives (M)	2,
Paid for guidebooks and magazines (M)	3,
Free catalogues, brochures (M)	4,
Internet websites (M)	5,
Social media sites (N)	6,
Travel / tourist agencies	7,
Newspaper, radio, TV (M)	8,
Other (DO NOT READ OUT)	9,
DK/NA	10,

FL 328 Q11a MODIFIED

PROG Q13: ROTATE CODES 1 TO 3

| Q13 | In 2012, which of the following type of holidays do you plan to take? |

(READ OUT – MULTIPLE ANSWER POSSIBLE)

Holidays with more than 13 consecutive nights	1,
Holidays between 4 and 13 consecutive nights	2,
Short-stay trip (up to 3 nights)	3,
No decisions yet (DO NOT READ OUT)	4,
No trip at all (DO NOT READ OUT)	5,
DK/NA	6,

NEW

ASK Q14 ONLY IF RESPONDENT ANSWERS THAT HE OR SHE ENVISAGES TO TAKE HOLIDAYS AWAY IN 2012, Q13=1-3, OTHERS GO TO Q15

Q14	In which country(ies) do you plan to spend your holidays in 2012?

(DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

IN YOUR COUNTRY	
In [OUR COUNTRY]	1,
OUTSIDE YOUR COUNTRY IN THE EUROPEAN UNION	
Austria	2,
Belgium	3,
Bulgaria	4,
Cyprus	5,
Czech Republic	6,
Denmark	7,
Estonia	8,
Finland	9,
France	10,
Germany	11,
Greece	12,
Hungary	13,
Ireland	14,
Italy	15,
Latvia	16,
Lithuania	17,
Luxembourg	18,
Malta	19,
Netherlands	20,
Poland	21,
Portugal	22,
Romania	23,
Slovakia	24,
Slovenia	25,
Spain	26,
Sweden	27,
United Kingdom	28,
IN ANOTHER COUNTRY OUTSIDE THE EUROPEAN UNION	
In another country outside the EU	29,
DK/NA	30,

NEW

9

ASK ALL

PROG: 3 ANSWERS POSSIBLE FOR CODES 2,3,4, ONE ANSWER ONLY FOR CODES 1,5, 6,7

Q15	Has the current economic situation had an impact on your holiday plans for 2012?

(READ OUT – 3 ANSWERS POSSIBLE)

It has not changed my planned holiday	1,
I will go on holiday but I changed my destinations	2,
I will go on holiday but for a shorter period	3,
I will go on holiday but I will spend less	4,
I will not go on holidays	5,
I do not go on holidays (DO NOT READ OUT)	6,
I didn't plan my holyday for 2012 (DO NOT READ OUT)	7,
DK/NA	8,

NEW

TABLES

Q1 Au cours de l'année 2011, combien de fois avez-vous voyagé et passé au moins une nuit en dehors de votre domicile pour des raisons privées ou professionnelles?

Q1 During 2011, how many times have you travelled for business or private purposes, where you were away from home for a minimum of one night?

Q1 Wie oft sind Sie im Jahr 2011 aus geschäftlichen oder privaten Gründen gereist, wobei Sie mindestens eine Nacht weg von zu Hause waren?

%	Ont voyagé en 2011 / Have travelled in 2011 / Ont voyagé en 2011		N'ont pas voyagé en 2011 / Have not travelled at all in 2011 / N'ont pas voyagé en 2011		Ne sait pas / Don't know / Weiß nicht	
	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328
EU 27	72	0	26	-1	2	1
BE	66	-8	33	7	1	1
BG	61	-5	32	0	7	5
CZ	70	6	27	-6	3	0
DK	87	0	12	-1	1	1
DE	80	1	18	-2	2	1
EE	73	10	22	-15	5	5
IE	86	3	14	-2	0	-1
EL	63	-14	37	14	0	0
ES	66	-3	33	2	1	1
FR	74	-5	21	0	5	5
IT	69	5	30	-6	1	1
CY	73	6	27	-6	0	0
LV	62	-3	37	2	1	1
LT	62	-7	30	0	8	7
LU	80	-5	20	6	0	-1
HU	55	10	44	-10	1	0
MT	50	-13	50	14	0	-1
NL	78	-9	21	9	1	0
AT	81	3	18	-2	1	-1
PL	69	2	27	-6	4	4
PT	54	-5	40	0	6	5
RO	58	0	39	-2	3	2
SI	83	7	16	-6	1	-1
SK	72	13	24	-13	4	0
FI	84	-5	14	5	2	0
SE	86	-1	12	1	2	0
UK	77	-1	21	0	2	1
HR	69	-1	28	-1	3	2
TR	44	7	48	-15	8	8
MK	51	-15	49	17	0	-2
IS	88	5	10	-5	2	0
NO	90	7	7	-1	3	-6
RS	42		58		0	
IL	69		30		1	

1

Q1T Au cours de l'année 2011, combien de fois avez-vous voyagé et passé au moins une nuit en dehors de votre domicile pour des raisons privées ou professionnelles?

Q1T During 2011, how many times have you travelled for business or private purposes, where you were away from home for a minimum of one night?

Q1T Wie oft sind Sie im Jahr 2011 aus geschäftlichen oder privaten Gründen gereist, wobei Sie mindestens eine Nacht weg von zu Hause waren?

%	Aucune / None / Keine		1		2		3		4 ou 5 fois / 4 or 5 times / 4 ou 5 fois		6 à 10 fois / 6 to 10 times / 6 bis 10 mal		Plus que 10 fois / More than 10 times / Plus que 10 fois		Ne sait pas / Don't know / Weiß nicht	
	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328
EU 27	26	-1	15	-1	12	-2	10	-1	13	0	11	1	11	3	2	1
BE	33	7	18	-6	14	-4	12	-2	10	-1	7	2	5	3	1	1
BG	32	0	10	2	7	-1	8	1	8	-4	13	0	15	-3	7	5
CZ	27	-6	11	-5	10	-3	6	-1	11	0	12	3	21	13	2	-1
DK	12	-1	15	-1	15	0	14	1	17	-3	16	2	10	1	1	1
DE	18	-2	16	-1	16	-1	13	-1	16	2	11	1	8	1	2	1
EE	22	-15	11	-8	10	-5	10	0	10	1	12	6	20	16	5	5
IE	14	-2	15	-2	18	2	15	-3	16	0	13	3	9	3	0	-1
EL	37	14	15	2	11	-1	8	-4	10	-4	10	-5	9	-2	0	0
ES	33	2	13	-4	14	1	9	0	11	-1	9	1	10	0	1	1
FR	21	0	14	-2	10	-4	9	-2	11	-5	14	2	16	6	5	5
IT	30	-6	21	3	14	1	10	-2	11	2	8	-1	5	2	1	1
CY	27	-6	22	-3	16	1	12	3	12	3	6	1	5	1	0	0
LV	37	2	14	-5	11	0	9	2	10	1	8	2	10	-3	1	1
LT	30	0	11	-2	7	-5	8	-2	10	-3	11	1	15	4	8	7
LU	20	6	18	4	15	-9	12	-6	14	-2	11	2	10	6	0	-1
HU	44	-11	13	-1	10	3	9	4	8	1	7	0	9	5	0	-1
MT	50	14	27	-2	13	-1	4	-3	4	-3	2	-2	0	-2	0	-1
NL	21	9	17	1	14	-4	11	-4	18	-2	10	0	8	0	1	0
AT	18	-2	15	0	15	-1	14	-2	15	2	12	1	10	3	1	-1
PL	27	-6	13	-3	9	-3	8	-1	12	3	13	3	14	3	4	4
PT	40	0	13	-3	10	1	7	-1	8	0	8	-1	8	-1	6	5
RO	39	-2	12	0	8	0	8	-1	10	0	11	0	9	1	3	2
SI	16	-7	17	2	12	-4	12	3	17	2	12	2	13	3	1	-1
SK	24	-13	11	-2	7	-3	5	0	10	-3	17	9	22	12	4	0
FI	14	5	9	0	10	0	10	1	15	-1	18	-1	22	-4	2	0
SE	12	1	11	0	9	-3	11	-1	16	-3	20	1	19	5	2	0
UK	21	0	13	-3	14	0	12	2	16	1	12	-2	10	1	2	1
HR	28	-1	12	-1	10	-2	9	0	15	3	12	-1	11	0	3	2
TR	48	-15	12	-4	9	3	7	1	6	3	4	0	6	4	8	8
MK	49	17	16	-1	8	-3	7	-2	7	-4	7	-3	6	-2	0	-2
IS	10	-5	14	-3	17	3	15	4	18	0	16	1	8	0	2	0
NO	7	-1	6	-1	15	7	11	2	17	2	23	-1	18	-2	3	-6
RS	58		13		8		6		7		3		5		0	
IL	30		19		13		11		11		8		7		1	

Q2.1 Et en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné moins de quatre nuits dans l'un des types de logements suivants?
Dans un logement payant (hôtel, maison ou appartement de location, etc…)

Q2.1 And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:
In paid accommodation (hotel/ rented apartment/house etc….)

Q2.1 Denken Sie jetzt bitte ausschließlich an private Urlaubsreisen: Wie häufig haben Sie weniger als vier Nächte in folgenden Unterkünften verbracht?
In einer bezahlten Unterkunft (Hotel/Pension/Ferienhaus etc.)

%	1 / 1 / 1	2 / 2 / 2	3 / 3 / 3	4 / 4 / 4	5 fois ou plus / 5 times or more / 5-mal oder mehr	Aucune/ zéro / None/ zero / Nie / Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	22	14	7	4	7	46	0
BE	27	16	8	5	6	38	0
BG	18	15	7	3	8	49	0
CZ	17	10	5	3	11	54	0
DK	25	12	8	3	3	49	0
DE	22	14	6	3	8	47	0
EE	15	8	4	2	11	59	1
IE	25	21	11	5	8	29	1
EL	23	12	4	2	7	52	0
ES	20	16	9	4	8	43	0
FR	20	12	8	3	8	49	0
IT	27	14	6	2	4	47	0
CY	23	15	9	3	7	42	1
LV	16	15	4	2	8	55	0
LT	20	9	5	2	7	57	0
LU	29	13	9	4	9	36	0
HU	18	13	5	4	7	53	0
MT	29	10	4	3	2	52	0
NL	27	16	9	4	4	40	0
AT	21	14	10	5	8	42	0
PL	16	14	8	5	11	46	0
PT	24	13	6	2	10	44	1
RO	18	14	6	3	8	50	1
SI	25	17	6	4	7	41	0
SK	17	12	6	2	10	53	0
FI	20	15	9	4	16	35	1
SE	20	14	8	6	9	42	1
UK	24	15	7	6	6	42	0
HR	14	13	4	2	6	60	1
TR	13	10	8	2	8	59	0
MK	15	11	4	2	5	63	0
IS	25	15	6	4	8	42	0
NO	18	19	8	7	9	39	0
RS	10	3	1	3	3	80	0
IL	26	22	7	4	8	30	3

3

Q2.2 Et en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné moins de quatre nuits dans l'un des types de logements suivants?
Dans votre résidence secondaire/un logement qui vous appartient

Q2.2 And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:
In own property/ second home

Q2.2 Denken Sie jetzt bitte ausschließlich an private Urlaubsreisen: Wie häufig haben Sie weniger als vier Nächte in folgenden Unterkünften verbracht?
Im eigenen Ferienhaus/der eigenen Ferienwohnung

%	1 / 1 / 1	2 / 2 / 2	3 / 3 / 3	4 / 4 / 4	5 fois ou plus / 5 times or more / 5-mal oder mehr	Aucune/ zéro / None/ zero / Nie / Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	5	3	2	1	7	81	1
BE	3	3	2	0	4	88	0
BG	4	5	4	4	23	59	1
CZ	5	6	4	2	26	56	1
DK	5	3	3	1	6	81	1
DE	5	2	1	1	2	89	0
EE	1	1	3	2	19	72	2
IE	5	2	2	1	3	86	1
EL	9	6	3	1	16	65	0
ES	4	3	2	2	13	76	0
FR	3	3	2	2	6	84	0
IT	7	3	1	0	5	84	0
CY	8	3	2	0	9	78	0
LV	6	7	4	1	16	65	1
LT	8	6	2	4	13	66	1
LU	9	3	1	1	4	82	0
HU	4	2	1	1	7	85	0
MT	1	1	1	0	1	96	0
NL	2	1	0	1	3	92	1
AT	5	2	1	0	3	89	0
PL	4	5	3	3	12	72	1
PT	13	5	4	2	13	62	1
RO	5	2	3	2	9	78	1
SI	5	3	2	1	9	80	0
SK	9	9	4	3	19	54	2
FI	5	4	3	1	19	67	1
SE	6	5	3	2	14	68	2
UK	4	4	2	1	4	84	1
HR	5	6	3	2	17	66	1
TR	7	5	5	2	7	73	1
MK	2	4	3	0	6	85	0
IS	5	5	3	2	8	76	1
NO	9	7	4	6	23	48	3
RS	3	3	3	4	6	81	0
IL	3	2	1	0	3	81	10

Q2.3 Et en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné moins de quatre nuits dans l'un des types de logements suivants?
Chez des amis ou des membres de votre famille

Q2.3 And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:
At friends or relatives

Q2.3 Denken Sie jetzt bitte ausschließlich an private Urlaubsreisen: Wie häufig haben Sie weniger als vier Nächte in folgenden Unterkünften verbracht?
Bei Freunden oder Verwandten

%	1	2	3	4	5 fois ou plus / 5 times or more / 5-mal oder mehr	Aucune/ zéro / None/ zero / Nie / Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	13	10	6	4	14	53	0
BE	11	6	4	3	11	65	0
BG	12	12	8	5	22	41	0
CZ	8	13	8	6	29	36	0
DK	12	10	5	3	13	56	1
DE	12	9	6	3	6	64	0
EE	10	14	7	4	28	36	1
IE	13	9	7	3	12	56	0
EL	12	8	5	3	10	62	0
ES	12	9	7	4	12	55	1
FR	13	13	8	5	23	38	0
IT	15	8	3	1	4	69	0
CY	14	6	3	2	5	70	0
LV	12	16	8	4	34	25	1
LT	18	13	7	6	22	33	1
LU	15	5	7	3	8	62	0
HU	12	10	8	4	16	50	0
MT	7	1	2	0	0	90	0
NL	10	7	6	3	12	61	1
AT	12	8	4	3	6	67	0
PL	12	11	9	6	26	36	0
PT	13	12	7	4	12	51	1
RO	9	14	8	5	16	47	1
SI	11	9	4	1	8	67	0
SK	11	10	7	5	26	39	2
FI	11	14	10	6	21	37	1
SE	13	14	9	6	17	40	1
UK	15	12	7	4	14	48	0
HR	12	12	7	4	18	47	0
TR	16	16	10	4	12	37	5
MK	12	10	5	1	7	65	0
IS	18	13	11	5	12	40	1
NO	14	14	9	6	19	37	1
RS	14	12	7	5	16	45	1
IL	10	8	6	2	15	53	6

Q2.4 Et en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné moins de quatre nuits dans l'un des types de logements suivants?
Dans un camping

Q2.4 And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:
On a camping site

Q2.4 Denken Sie jetzt bitte ausschließlich an private Urlaubsreisen: Wie häufig haben Sie weniger als vier Nächte in folgenden Unterkünften verbracht?
Auf einem Campingplatz

%	1 / 1 / 1	2 / 2 / 2	3 / 3 / 3	4 / 4 / 4	5 fois ou plus / 5 times or more / 5-mal oder mehr	Aucune/ zéro / None/ zero / Nie / Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	6	2	1	1	2	88	0
BE	5	2	0	1	2	89	1
BG	5	3	2	1	2	87	0
CZ	11	4	1	0	3	81	0
DK	5	1	1	0	2	90	1
DE	5	2	1	0	1	91	0
EE	8	5	3	1	1	82	0
IE	6	2	1	0	2	89	0
EL	4	1	0	0	1	94	0
ES	5	1	1	0	1	92	0
FR	8	1	1	1	2	87	0
IT	4	1	1	0	0	94	0
CY	3	2	0	1	0	94	0
LV	10	3	1	1	1	83	1
LT	8	3	2	1	1	84	1
LU	4	1	0	0	0	95	0
HU	3	2	1	0	1	93	0
MT	2	1	0	0	1	96	0
NL	9	2	1	0	4	84	0
AT	4	2	0	0	1	93	0
PL	5	2	1	0	2	90	0
PT	9	2	2	0	3	84	0
RO	7	5	3	1	3	81	0
SI	7	3	0	1	3	86	0
SK	6	2	0	1	1	90	0
FI	7	2	1	1	1	88	0
SE	6	3	0	0	2	88	1
UK	10	4	2	0	3	81	0
HR	2	0	0	1	1	96	0
TR	4	2	2	1	1	89	1
MK	4	2	2	0	0	92	0
IS	13	8	2	4	6	67	0
NO	7	3	1	1	4	84	0
RS	2	0	0	1	1	95	1
IL	7	3	1	1	2	80	6

6

Q2.5 Et en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné moins de quatre nuits dans l'un des types de logements suivants?
Dans un autre type de logement
Q2.5 And now thinking about personal holidays only, how many times did you stay for less than four nights in the following types of accommodations:
In another type of location
Q2.5 Denken Sie jetzt bitte ausschließlich an private Urlaubsreisen: Wie häufig haben Sie weniger als vier Nächte in folgenden Unterkünften verbracht?
In einer anderen Unterkunft

%	1 1 1 Flash EB 334	2 2 2 Flash EB 334	3 3 3 Flash EB 334	4 4 4 Flash EB 334	5 fois ou plus 5 times or more 5-mal oder mehr Flash EB 334	Aucune/ zéro None/ zero Nie / Null Flash EB 334	Ne sait pas Don't know Weiß nicht Flash EB 334
EU 27	6	3	1	1	3	85	1
BE	8	3	2	1	3	83	0
BG	5	4	3	1	3	82	2
CZ	6	2	1	1	5	84	1
DK	6	2	1	0	1	88	2
DE	7	5	2	1	3	82	0
EE	4	2	0	0	1	92	1
IE	5	2	1	1	1	90	0
EL	2	1	0	0	1	96	0
ES	3	3	1	1	2	90	0
FR	6	4	2	1	3	83	1
IT	4	1	1	0	1	93	0
CY	4	2	0	0	0	94	0
LV	9	2	2	0	8	78	1
LT	6	5	2	2	3	81	1
LU	6	2	1	0	1	89	1
HU	5	2	1	0	4	87	1
MT	6	1	0	0	1	92	0
NL	7	3	1	1	2	85	1
AT	6	4	1	1	1	87	0
PL	7	5	2	1	5	79	1
PT	4	3	1	1	3	88	0
RO	5	5	2	1	4	82	1
SI	5	3	2	1	1	88	0
SK	7	5	3	0	7	77	1
FI	4	5	2	1	3	84	1
SE	6	4	1	1	3	84	1
UK	6	4	2	1	2	84	1
HR	4	3	2	0	4	87	0
TR	6	3	3	2	4	81	1
MK	2	1	1	0	0	96	0
IS	5	5	1	1	2	86	0
NO	7	7	5	1	5	70	5
RS	3	1	0	0	1	92	3
IL	11	6	4	3	5	62	9

Q3.1 Toujours en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné quatre nuits ou plus dans l'un des types de logements suivants?
Dans un logement payant (hôtel, maison ou appartement de location, etc…)

Q3.1 Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:
In paid accommodation (hotel/ rented apartment/house etc….)

Q3.1 Und wie häufig haben Sie auf privaten Urlaubsreisen mindestens vier Nächte in einer der folgenden Unterkünfte verbracht?
In einer bezahlten Unterkunft (Hotel/Pension/Ferienhaus etc.)

%	1 1 1 Flash EB 334	2 2 2 Flash EB 334	3 3 3 Flash EB 334	4 4 4 Flash EB 334	5 fois ou plus 5 times or more 5-mal oder mehr Flash EB 334	Aucune/ zéro None/ zero Nie/Null Flash EB 334	Ne sait pas Don't know Weiß nicht Flash EB 334
EU 27	29	14	7	4	6	40	0
BE	33	15	10	4	6	32	0
BG	22	9	6	4	4	55	0
CZ	28	13	5	2	8	44	0
DK	34	18	8	4	4	32	0
DE	29	20	10	4	7	30	0
EE	17	8	4	2	5	63	1
IE	32	17	8	4	6	33	0
EL	24	9	4	2	5	56	0
ES	28	13	7	3	8	41	0
FR	27	14	5	3	6	44	1
IT	30	10	5	2	3	49	1
CY	28	13	4	3	7	45	0
LV	17	7	5	3	8	60	0
LT	19	8	4	2	4	62	1
LU	26	19	9	2	7	33	4
HU	23	8	4	1	7	57	0
MT	37	16	3	2	5	37	0
NL	36	18	11	5	3	27	0
AT	28	19	8	6	7	32	0
PL	23	12	4	4	7	49	1
PT	30	8	4	4	9	44	1
RO	26	10	5	2	5	52	0
SI	35	18	8	4	6	29	0
SK	26	12	5	2	9	45	1
FI	25	13	5	1	5	50	1
SE	27	14	7	4	6	41	1
UK	34	16	8	5	6	31	0
HR	22	7	3	3	5	60	0
TR	14	8	6	4	9	59	0
MK	32	14	3	2	5	43	1
IS	26	11	5	1	3	54	0
NO	25	20	11	5	5	34	0
RS	23	5	3	1	7	60	1
IL	22	12	4	5	5	45	7

Q3.2 Toujours en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné quatre nuits ou plus dans l'un des types de logements suivants?
Dans votre résidence secondaire/un logement qui vous appartient

Q3.2 Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:
In own property/ second home

Q3.2 Und wie häufig haben Sie auf privaten Urlaubsreisen mindestens vier Nächte in einer der folgenden Unterkünfte verbracht?
Im eigenen Ferienhaus/der eigenen Ferienwohnung

	1	2	3	4	5 fois ou plus	Aucune/ zéro	Ne sait pas
	1	2	3	4	5 times or more	None/ zero	Don't know
%	1	2	3	4	5-mal oder mehr	Nie/Null	Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	6	4	2	1	6	80	1
BE	4	2	1	1	4	88	0
BG	4	4	3	1	19	68	1
CZ	6	6	3	2	18	65	0
DK	11	3	1	1	4	78	2
DE	8	2	1	1	2	86	0
EE	3	5	1	1	14	74	2
IE	4	3	1	1	2	88	1
EL	15	7	2	2	12	62	0
ES	8	5	3	2	13	69	0
FR	4	4	2	1	7	81	1
IT	8	3	1	1	4	83	0
CY	7	4	2	1	6	80	0
LV	3	5	2	1	19	70	0
LT	5	2	2	2	6	81	2
LU	8	6	2	1	3	76	4
HU	2	1	1	0	4	91	1
MT	2	2	0	0	2	93	1
NL	4	1	1	1	4	88	1
AT	6	2	1	1	3	87	0
PL	4	3	2	2	9	79	1
PT	8	5	3	3	10	69	2
RO	4	3	2	2	8	80	1
SI	7	3	1	0	8	81	0
SK	11	6	3	2	16	60	2
FI	7	4	2	2	12	71	2
SE	9	4	4	3	13	66	1
UK	6	4	1	2	2	84	1
HR	10	3	4	3	14	66	0
TR	7	5	4	2	12	69	1
MK	7	1	1	1	6	83	1
IS	6	3	2	1	5	82	1
NO	12	7	6	6	15	53	1
RS	3	1	2	1	5	88	0
IL	2	2	1	0	3	83	9

Q3.3 Toujours en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné quatre nuits ou plus dans l'un des types de logements suivants?
Chez des amis ou des membres de votre famille

Q3.3 Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:
At friends or relatives

Q3.3 Und wie häufig haben Sie auf privaten Urlaubsreisen mindestens vier Nächte in einer der folgenden Unterkünfte verbracht?
Bei Freunden oder Verwandten

%	1 / 1 / 1	2 / 2 / 2	3 / 3 / 3	4 / 4 / 4	5 fois ou plus / 5 times or more / 5-mal oder mehr	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	13	7	4	2	8	65	1
BE	11	4	3	1	6	74	1
BG	8	7	5	5	11	63	1
CZ	10	7	4	3	15	61	0
DK	10	4	2	2	4	77	1
DE	10	6	3	2	4	75	0
EE	6	6	3	1	11	72	1
IE	15	6	2	2	3	72	0
EL	13	6	3	2	6	70	0
ES	14	9	4	3	8	62	0
FR	17	11	6	4	17	44	1
IT	13	5	2	1	3	76	0
CY	11	4	2	1	5	77	0
LV	10	7	5	4	14	60	0
LT	10	9	3	3	10	63	2
LU	12	10	4	1	3	66	4
HU	10	7	3	3	8	69	0
MT	14	2	2	0	1	81	0
NL	13	4	2	1	6	74	0
AT	10	4	3	1	3	79	0
PL	13	8	7	4	15	53	0
PT	14	8	4	3	9	62	0
RO	10	8	6	4	12	60	0
SI	13	2	4	1	6	74	0
SK	9	8	5	4	18	55	1
FI	11	5	4	2	6	71	1
SE	16	9	6	3	8	57	1
UK	13	9	3	3	6	65	1
HR	17	10	4	4	11	54	0
TR	12	9	6	3	16	52	2
MK	12	5	4	2	4	73	0
IS	18	10	5	1	7	58	1
NO	14	9	5	4	7	59	2
RS	10	5	1	2	7	75	0
IL	8	7	1	1	5	71	7

Q3.4 Toujours en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné quatre nuits ou plus dans l'un des types de logements suivants?
Dans un camping

Q3.4 Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:
On a camping site

Q3.4 Und wie häufig haben Sie auf privaten Urlaubsreisen mindestens vier Nächte in einer der folgenden Unterkünfte verbracht?
Auf einem Campingplatz

%	1 / 1 / 1	2 / 2 / 2	3 / 3 / 3	4 / 4 / 4	5 fois ou plus / 5 times or more / 5-mal oder mehr	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	7	2	1	0	1	89	0
BE	7	1	1	0	2	88	1
BG	4	1	0	0	2	93	0
CZ	8	2	1	0	2	87	0
DK	8	2	0	0	2	87	1
DE	5	1	1	0	2	91	0
EE	0	1	1	1	0	97	0
IE	4	1	1	0	1	93	0
EL	5	0	0	0	0	95	0
ES	3	1	1	0	1	94	0
FR	11	2	1	0	2	84	0
IT	5	0	0	0	1	94	0
CY	3	1	0	1	0	95	0
LV	3	0	2	1	1	93	0
LT	6	1	0	0	0	92	1
LU	4	0	0	0	0	91	5
HU	3	0	0	0	1	96	0
MT	3	1	0	0	2	94	0
NL	17	6	2	1	2	72	0
AT	3	1	1	1	1	93	0
PL	5	1	0	0	1	93	0
PT	6	1	1	1	2	88	1
RO	5	3	1	1	1	89	0
SI	9	3	1	1	2	84	0
SK	4	1	0	1	2	92	0
FI	2	1	0	1	1	94	1
SE	4	0	1	0	2	92	1
UK	9	2	0	1	2	86	0
HR	5	0	0	0	0	94	1
TR	5	1	1	0	4	89	0
MK	3	0	1	0	1	95	0
IS	7	3	1	1	1	87	0
NO	6	0	0	0	3	89	2
RS	1	0	0	1	0	98	0
IL	3	2	1	0	1	85	8

Q3.5 Toujours en ce qui concerne uniquement vos vacances personnelles, combien de fois avez-vous séjourné quatre nuits ou plus dans l'un des types de logements suivants?
Dans un autre type de logement

Q3.5 Again thinking only about your personal holidays, how many times did you stay for a minimum of four nights in the following types of accommodation:
In another type of location

Q3.5 Und wie häufig haben Sie auf privaten Urlaubsreisen mindestens vier Nächte in einer der folgenden Unterkünfte verbracht?
In einer anderen Unterkunft

%	1	2	3	4	5 fois ou plus / 5 times or more / 5-mal oder mehr	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	5	2	1	1	2	89	0
BE	6	2	2	1	2	86	1
BG	5	2	1	1	3	87	1
CZ	7	3	1	0	4	85	0
DK	5	1	1	0	1	91	1
DE	7	3	1	1	2	85	1
EE	2	1	1	0	1	93	2
IE	5	1	0	0	1	93	0
EL	2	1	0	0	0	97	0
ES	3	2	1	0	1	93	0
FR	5	3	1	1	2	87	1
IT	4	1	0	0	1	94	0
CY	2	1	0	0	0	97	0
LV	4	1	0	0	5	90	0
LT	7	1	0	0	1	89	2
LU	5	1	2	0	1	87	4
HU	3	1	1	1	1	93	0
MT	7	1	0	1	1	90	0
NL	7	2	1	1	1	88	0
AT	5	2	1	1	1	90	0
PL	6	2	1	1	3	86	1
PT	3	2	1	1	2	90	1
RO	5	2	1	0	3	89	0
SI	4	2	1	0	2	91	0
SK	6	3	1	1	4	84	1
FI	5	2	0	0	1	90	2
SE	4	2	1	1	2	89	1
UK	6	3	1	1	1	88	0
HR	3	2	1	0	2	91	1
TR	5	3	3	0	2	87	0
MK	2	1	0	0	1	96	0
IS	2	1	2	0	1	93	1
NO	9	3	1	1	2	82	2
RS	3	0	0	0	1	93	3
IL	6	3	1	0	4	77	9

12

Q4 Quelle est la principale raison pour laquelle vous n'êtes pas parti(e) en vacances en 2011?

Q4 What was the main reason why you did not go on holiday in 2011?

Q4 Welches war der Hauptgrund dafür, dass Sie 2011 nicht in Urlaub gefahren sind?

%	Raisons personnelles/privées Personal/private reasons Persönliche/private Gründe		Raisons financières Financial reasons Finanzielle Gründe		Manque de temps Lack of time Zeitmangel		Craintes pour la sécurité Concerns about safety Bedenken wegen der Sicherheit		Préférence pour rester à la maison ou avec la famille/les amis Preferred to stay at home or with family / friends Ich habe es vorgezogen, zu Hause zu bleiben oder bei der Familie/bei Freunden	
	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328
EU 27	23	-2	45	2	9	0	0	-1	11	1
BE	26	-5	30	14	6	-7	1	-1	20	-1
BG	12	-1	71	4	5	-4	0	0	5	0
CZ	23	-6	42	9	17	9	1	-2	12	1
DK	36	8	17	-10	12	0	0	0	18	7
DE	37	5	24	-6	17	8	0	-1	10	-1
EE	25	5	36	-8	13	4	0	-4	8	-5
IE	12	-7	62	18	6	0	0	0	7	-6
EL	12	-8	70	14	7	-2	0	-1	5	-2
ES	20	-4	53	5	8	0	0	0	10	0
FR	22	-3	38	-2	9	-1	1	1	13	3
IT	29	-9	46	10	7	-6	0	-1	9	-1
CY	26	8	52	7	4	-3	3	1	5	1
LV	13	1	46	-6	12	0	2	1	17	11
LT	25	10	37	-7	8	-2	0	-4	15	6
LU	25	-20	30	6	13	7	2	0	11	0
HU	12	2	66	-4	8	3	1	1	7	1
MT	16	-1	46	-4	6	1	1	-1	10	1
NL	31	2	32	8	7	1	0	0	12	5
AT	37	6	15	-10	14	2	0	-2	17	2
PL	17	-1	51	2	12	1	1	0	9	-2
PT	10	-6	60	2	6	-2	0	0	11	6
RO	15	3	62	-2	10	3	1	1	7	2
SI	34	11	37	-2	13	11	0	0	6	-4
SK	24	4	51	3	8	1	1	0	8	-4
FI	23	2	20	-8	14	4	1	0	24	10
SE	31	8	24	8	7	0	1	0	15	6
UK	19	-3	39	-2	7	1	1	0	14	2
HR	21	-9	55	2	8	0	0	0	8	5
TR	17	-8	41	-6	19	2	0	-1	14	10
MK	21	-4	59	6	8	-5	0	-1	6	3
IS	11	-10	31	-5	13	3	0	-1	16	8
NO	25	18	29	8	12	7	3	3	20	10
RS	40		47		5		0		3	
IL	28		32		9		1		12	

Q4 Quelle est la principale raison pour laquelle vous n'êtes pas parti(e) en vacances en 2011?

Q4 What was the main reason why you did not go on holiday in 2011?

Q4 Welches war der Hauptgrund dafür, dass Sie 2011 nicht in Urlaub gefahren sind?

%	Problèmes d'accessibilité des moyens de transport ou d'un logement / Problems of accessibility of transport or accommodation / Probleme bezüglich der Verfügbarkeit von Verkehrsmitteln oder einer Unterkunft		Vous n'aviez pas envie de partir en vacances en 2011 (NE PAS LIRE) / You did not want to go on holiday in 2011 (DO NOT READ OUT) / Sie wollten 2011 nicht in den Urlaub fahren (NICHT VORLESEN)		Autre (NE PAS LIRE) / Other (DO NOT READ OUT) / Spontan: Andere (NICHT VORLESEN)		Ne sait pas / Don't know / Weiß nicht	
	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328	Flash EB 334	Diff. Flash EB 328
EU 27	1	1	4	1	6	-3	1	1
BE	2	2	7	1	7	-2	1	-1
BG	0	0	2	0	5	1	0	0
CZ	1	1	1	-6	3	-6	0	0
DK	0	0	6	1	9	-8	2	2
DE	0	0	5	-1	6	-4	1	0
EE	0	0	6	2	12	7	0	-1
IE	2	2	2	-4	9	-1	0	-2
EL	1	1	1	-1	4	-1	0	0
ES	1	1	1	-1	7	-1	0	0
FR	1	1	7	4	8	-4	1	1
IT	0	0	5	4	3	2	1	1
CY	0	0	3	-1	6	-14	1	1
LV	1	1	4	0	5	-8	0	0
LT	0	0	0	-4	15	3	0	-2
LU	2	2	4	0	10	2	3	3
HU	1	1	2	0	3	-4	0	0
MT	0	0	12	5	8	-1	1	0
NL	2	2	10	4	5	-21	1	-1
AT	0	0	6	2	9	0	2	0
PL	0	0	2	2	8	-2	0	0
PT	0	0	3	0	10	0	0	0
RO	0	0	1	-1	3	-7	1	1
SI	0	0	4	-1	5	-16	1	1
SK	0	0	1	-6	4	-1	3	3
FI	0	0	11	0	3	-12	4	4
SE	1	1	12	9	7	-27	2	-5
UK	4	4	4	0	11	-1	1	-1
HR	0	0	1	-1	5	2	2	1
TR	1	1	2	1	6	1	0	0
MK	0	0	3	2	2	-1	1	0
IS	2	2	6	0	16	0	5	3
NO	0	0	1	-1	8	-39	2	-6
RS	0		1		2		2	
IL	1		6		7		4	

Q5 Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5 In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5 In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

	%	En [NOTRE PAYS] In [OUR COUNTRY] In [UNSER LAND]	Autriche Austria Österreich	Belgique Belgium Belgien	Bulgarie Bulgaria Bulgarien	Chypre Cyprus Zypern	République tchèque Czech Republic Tschechische Republik	Danemark Denmark Dänemark	Estonie Estonia Estland
		Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	**56**	**5**	**1**	**1**	**1**	**1**	**1**	**0**
	BE	**15**	**5**	**0**	**1**	**0**	**0**	**0**	**0**
	BG	**77**	**1**	**0**	**0**	**0**	**0**	**1**	**0**
	CZ	**54**	**6**	**0**	**2**	**0**	**0**	**0**	**0**
	DK	**42**	**6**	**1**	**0**	**1**	**2**	**0**	**0**
	DE	**45**	**14**	**1**	**1**	**1**	**2**	**3**	**0**
	EE	**56**	**4**	**1**	**1**	**0**	**4**	**2**	**0**
	IE	**33**	**2**	**1**	**0**	**1**	**1**	**0**	**1**
	EL	**80**	**2**	**1**	**3**	**3**	**1**	**0**	**0**
	ES	**69**	**1**	**1**	**0**	**0**	**1**	**0**	**0**
	FR	**65**	**1**	**2**	**0**	**0**	**0**	**0**	**0**
	IT	**74**	**2**	**1**	**0**	**0**	**1**	**1**	**0**
	CY	**44**	**2**	**1**	**2**	**0**	**2**	**2**	**0**
	LV	**44**	**2**	**1**	**0**	**0**	**4**	**1**	**8**
	LT	**55**	**1**	**1**	**0**	**0**	**2**	**1**	**2**
	LU	**2**	**9**	**17**	**2**	**2**	**1**	**1**	**1**
	HU	**64**	**7**	**1**	**1**	**1**	**1**	**1**	**0**
	MT	**5**	**3**	**3**	**1**	**2**	**0**	**0**	**1**
	NL	**32**	**8**	**6**	**1**	**0**	**1**	**2**	**0**
	AT	**46**	**0**	**0**	**1**	**0**	**2**	**0**	**0**
	PL	**67**	**3**	**2**	**2**	**0**	**3**	**1**	**0**
	PT	**59**	**0**	**0**	**0**	**0**	**0**	**1**	**0**
	RO	**63**	**5**	**1**	**5**	**0**	**1**	**0**	**0**
	SI	**33**	**7**	**0**	**0**	**1**	**1**	**1**	**0**
	SK	**58**	**7**	**1**	**3**	**0**	**16**	**0**	**0**
	FI	**58**	**3**	**0**	**1**	**1**	**1**	**3**	**8**
	SE	**57**	**3**	**2**	**0**	**1**	**1**	**4**	**1**
	UK	**46**	**1**	**1**	**1**	**3**	**0**	**0**	**0**
	HR	**73**	**7**	**1**	**1**	**0**	**2**	**1**	**0**
	TR	**91**	**1**	**0**	**1**	**0**	**0**	**1**	**0**
	MK	**42**	**3**	**0**	**9**	**0**	**1**	**0**	**0**
	IS	**63**	**1**	**1**	**0**	**0**	**0**	**15**	**0**
	NO	**42**	**2**	**0**	**1**	**0**	**0**	**10**	**0**
	RS	**43**	**3**	**0**	**2**	**0**	**2**	**0**	**0**
	IL	**33**	**2**	**0**	**2**	**1**	**2**	**2**	**0**

15

Q5 Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5 In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5 In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

		Finlande / Finland / Finnland	France / France / Frankreich	Allemagne / Germany / Deutschland	Grèce / Greece / Griechenland	Hongrie / Hungary / Ungarn	Irlande / Ireland / Irland	Italie / Italy / Italien	Lettonie / Latvia / Lettland
	%	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	0	8	5	4	1	1	9	0
	BE	0	40	8	5	2	1	13	0
	BG	0	3	3	10	0	0	1	0
	CZ	0	5	8	7	3	1	12	0
	DK	0	10	16	5	1	1	14	0
	DE	0	8	0	4	2	1	18	0
	EE	21	6	7	3	1	1	3	7
	IE	0	13	3	3	0	0	9	0
	EL	0	3	6	0	1	0	3	0
	ES	1	8	3	2	1	1	7	0
	FR	0	0	3	2	1	1	8	0
	IT	0	7	3	3	0	1	0	0
	CY	0	4	5	50	2	0	5	0
	LV	3	4	17	1	0	1	9	0
	LT	0	6	9	3	1	2	6	12
	LU	1	27	20	4	0	1	18	0
	HU	0	1	8	4	0	1	6	0
	MT	0	11	12	3	0	2	37	0
	NL	0	22	17	4	1	1	14	0
	AT	1	7	16	6	4	1	26	0
	PL	0	3	11	3	1	0	5	0
	PT	0	11	3	0	0	0	4	0
	RO	0	3	9	5	7	0	10	0
	SI	1	5	6	5	1	1	11	1
	SK	0	3	4	4	7	1	9	0
	FI	0	4	8	6	2	0	7	2
	SE	3	8	8	7	1	0	10	0
	UK	0	12	4	5	0	2	5	0
	HR	0	3	5	0	2	0	9	0
	TR	0	2	2	1	0	0	1	0
	MK	0	2	6	20	0	0	4	0
	IS	2	3	7	2	1	1	3	0
	NO	1	6	5	9	2	1	6	0
	RS	0	2	7	16	4	0	3	0
	IL	0	10	12	7	2	1	9	0

Q5 Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5 In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5 In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	Lituanie / Lithuania / Litauen	Luxembourg / Luxembourg / Luxemburg	Malte / Malta / Malta	Pays-Bas / Netherlands / Niederlande	Pologne / Poland / Polen	Portugal / Portugal / Portugal	Roumanie / Romania / Rumänien	Slovaquie / Slovakia / Slowakei
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	0	0	0	2	1	2	1	1
BE	0	1	0	8	2	2	1	0
BG	0	0	0	1	1	0	1	0
CZ	0	0	0	1	3	1	1	13
DK	0	0	0	3	2	2	0	0
DE	0	0	1	5	3	2	1	1
EE	4	0	0	1	5	1	0	0
IE	0	0	0	2	2	7	0	0
EL	0	0	0	2	0	1	0	0
ES	0	0	0	2	0	4	1	0
FR	0	1	0	0	0	2	0	0
IT	0	0	0	1	0	1	1	0
CY	0	0	1	3	1	0	2	1
LV	10	0	0	0	2	2	0	2
LT	0	0	0	1	5	0	0	2
LU	1	0	0	5	2	22	1	1
HU	0	1	0	2	1	0	4	1
MT	0	0	0	4	1	1	1	0
NL	0	1	0	0	1	3	1	0
AT	0	0	0	2	1	2	2	0
PL	1	0	0	2	0	1	0	2
PT	0	0	0	1	1	0	0	0
RO	0	0	0	1	0	1	0	1
SI	0	0	1	2	1	0	1	2
SK	0	0	0	1	3	1	1	0
FI	0	0	0	1	2	3	0	0
SE	0	0	1	1	1	1	0	0
UK	0	0	1	2	1	5	0	0
HR	0	0	1	1	1	1	0	1
TR	0	0	0	0	0	0	0	0
MK	0	1	0	0	0	0	0	0
IS	1	1	0	0	2	1	0	0
NO	0	0	0	2	2	1	0	0
RS	0	0	0	1	0	0	1	1
IL	0	1	2	2	1	1	2	1

17

Q5 Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5 In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5 In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	Slovénie / Slovenia / Slowenien	Espagne / Spain / Spanien	Suède / Sweden / Schweden	Royaume Uni / United Kingdom / Vereinigtes Königreich	Dans un autre pays en dehors de l'UE / In another country outside the EU / In einem anderen Land außerhalb der EU	Ne sait pas / Don't know / Weiß nicht	Dans l'EU / In the EU / Dans l'EU
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	0	11	1	3	22	1	44
BE	0	16	1	3	31	0	76
BG	0	2	0	2	9	1	23
CZ	1	3	0	4	28	2	47
DK	0	16	10	6	35	0	66
DE	0	14	2	2	29	0	60
EE	1	7	7	6	29	0	59
IE	1	31	0	22	21	1	71
EL	0	3	1	3	7	0	27
ES	0	0	1	5	12	2	28
FR	0	12	1	3	21	1	30
IT	1	9	1	2	14	0	27
CY	1	3	2	14	10	1	73
LV	0	5	5	17	15	1	58
LT	0	5	1	6	23	3	48
LU	0	12	2	3	25	0	93
HU	1	2	0	2	15	3	32
MT	1	12	2	27	15	0	91
NL	0	15	1	5	30	0	69
AT	3	9	2	3	35	1	62
PL	0	3	1	8	13	3	36
PT	0	20	1	4	15	4	35
RO	1	5	1	2	8	4	38
SI	0	4	0	2	69	0	36
SK	1	4	1	1	15	1	49
FI	1	13	7	3	24	1	52
SE	0	15	0	4	28	0	53
UK	0	20	0	0	32	1	48
HR	7	3	0	1	21	4	29
TR	0	0	0	0	9	1	6
MK	2	0	1	0	35	3	41
IS	0	18	7	12	29	0	55
NO	0	21	12	10	28	1	64
RS	2	2	1	0	44	0	38
IL	1	9	0	4	19	10	52

Q5A Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5A In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5A In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

	%	Autriche / Austria / Österreich	Belgique / Belgium / Belgien	Bulgarie / Bulgaria / Bulgarien	Chypre / Cyprus / Zypern	République tchèque / Czech Republic / Tschechische Republik	Danemark / Denmark / Dänemark	Estonie / Estonia / Estland	Finlande / Finland / Finnland
		Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	5	2	2	1	2	2	0	1
	BE	5	15	1	0	0	0	0	0
	BG	1	0	77	0	0	1	0	0
	CZ	6	0	2	0	54	0	0	0
	DK	6	1	0	1	2	42	0	0
	DE	14	1	1	1	2	3	0	0
	EE	4	1	1	0	4	2	56	21
	IE	2	1	0	1	1	0	1	0
	EL	2	1	3	3	1	0	0	0
	ES	1	1	0	0	1	0	0	1
	FR	1	2	0	0	0	0	0	0
	IT	2	1	0	0	1	1	0	0
	CY	2	1	2	44	2	2	0	0
	LV	2	1	0	0	4	1	8	3
	LT	1	1	0	0	2	1	2	0
	LU	9	17	2	2	1	1	1	1
	HU	7	1	1	1	1	1	0	0
	MT	3	3	1	2	0	0	1	0
	NL	8	6	1	0	1	2	0	0
	AT	46	0	1	0	2	0	0	1
	PL	3	2	2	0	3	1	0	0
	PT	0	0	0	0	0	1	0	0
	RO	5	1	5	0	1	0	0	0
	SI	7	0	0	1	1	1	0	1
	SK	7	1	3	0	16	0	0	0
	FI	3	0	1	1	1	3	8	58
	SE	3	2	0	1	1	4	1	3
	UK	1	1	1	3	0	0	0	0
	HR	7	1	1	0	2	1	0	0
	TR	1	0	1	0	0	1	0	0
	MK	3	0	9	0	1	0	0	0
	IS	1	1	0	0	0	15	0	2
	NO	2	0	1	0	0	10	0	1
	RS	3	0	2	0	2	0	0	0
	IL	2	0	2	1	2	2	0	0

Q5A Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5A In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5A In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	France / France / Frankreich	Allemagne / Germany / Deutschland	Grèce / Greece / Griechenland	Hongrie / Hungary / Ungarn	Irlande / Ireland / Irland	Italie / Italy / Italien	Lettonie / Latvia / Lettland	Lituanie / Lithuania / Litauen
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	16	13	5	2	1	17	0	0
BE	40	8	5	2	1	13	0	0
BG	3	3	10	0	0	1	0	0
CZ	5	8	7	3	1	12	0	0
DK	10	16	5	1	1	14	0	0
DE	8	45	4	2	1	18	0	0
EE	6	7	3	1	1	3	7	4
IE	13	3	3	0	33	9	0	0
EL	3	6	80	1	0	3	0	0
ES	8	3	2	1	1	7	0	0
FR	65	3	2	1	1	8	0	0
IT	7	3	3	0	1	74	0	0
CY	4	5	50	2	0	5	0	0
LV	4	17	1	0	1	9	44	10
LT	6	9	3	1	2	6	12	55
LU	27	20	4	0	1	18	0	1
HU	1	8	4	64	1	6	0	0
MT	11	12	3	0	2	37	0	0
NL	22	17	4	1	1	14	0	0
AT	7	16	6	4	1	26	0	0
PL	3	11	3	1	0	5	0	1
PT	11	3	0	0	0	4	0	0
RO	3	9	5	7	0	10	0	0
SI	5	6	5	1	1	11	1	0
SK	3	4	4	7	1	9	0	0
FI	4	8	6	2	0	7	2	0
SE	8	8	7	1	0	10	0	0
UK	12	4	5	0	2	5	0	0
HR	3	5	0	2	0	9	0	0
TR	2	2	1	0	0	1	0	0
MK	2	6	20	0	0	4	0	0
IS	3	7	2	1	1	3	0	1
NO	6	5	9	2	1	6	0	0
RS	2	7	16	4	0	3	0	0
IL	10	12	7	2	1	9	0	0

Q5A Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5A In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5A In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	Luxembourg / Luxembourg / Luxemburg	Malte / Malta / Malta	Pays-Bas / Netherlands / Niederlande	Pologne / Poland / Polen	Portugal / Portugal / Portugal	Roumanie / Romania / Rumänien	Slovaquie / Slovakia / Slowakei	Slovénie / Slovenia / Slowenien
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	0	0	3	6	3	3	1	0
BE	1	0	8	2	2	1	0	0
BG	0	0	1	1	0	1	0	0
CZ	0	0	1	3	1	1	13	1
DK	0	0	3	2	2	0	0	0
DE	0	1	5	3	2	1	1	0
EE	0	0	1	5	1	0	0	1
IE	0	0	2	2	7	0	0	1
EL	0	0	2	0	1	0	0	0
ES	0	0	2	0	4	1	0	0
FR	1	0	0	0	2	0	0	0
IT	0	0	1	0	1	1	0	1
CY	0	1	3	1	0	2	1	1
LV	0	0	0	2	2	0	2	0
LT	0	0	1	5	0	0	2	0
LU	2	0	5	2	22	1	1	0
HU	1	0	2	1	0	4	1	1
MT	0	5	4	1	1	1	0	1
NL	1	0	32	1	3	1	0	0
AT	0	0	2	1	2	2	0	3
PL	0	0	2	67	1	0	2	0
PT	0	0	1	1	59	0	0	0
RO	0	0	1	0	1	63	1	1
SI	0	1	2	1	0	1	2	33
SK	0	0	1	3	1	1	58	1
FI	0	0	1	2	3	0	0	1
SE	0	1	1	1	1	0	0	0
UK	0	1	2	1	5	0	0	0
HR	0	1	1	1	1	0	1	7
TR	0	0	0	0	0	0	0	0
MK	1	0	0	0	0	0	0	2
IS	1	0	0	2	1	0	0	0
NO	0	0	2	2	1	0	0	0
RS	0	0	1	0	0	1	1	2
IL	1	2	2	1	1	2	1	1

Q5A Dans quel(s) pays vous êtes-vous rendu(e) pendant 4 nuits ou plus en 2011? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q5A In which country(ies) did you go for a minimum of 4 nights in 2011? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q5A In welchem Land/welchen Ländern haben Sie 2011 mindestens vier Nächte verbracht? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

		Espagne / Spain / Spanien	Suède / Sweden / Schweden	Royaume Uni / United Kingdom / Vereinigtes Königreich	Dans un autre pays en dehors de l'UE / In another country outside the EU / In einem anderen Land außerhalb der EU	Ne sait pas / Don't know / Weiß nicht	Dans l'EU / In the EU / Dans l'EU
	%	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	**17**	**3**	**10**	**22**	**1**	**89**
	BE	16	1	3	31	0	85
	BG	2	0	2	9	1	94
	CZ	3	0	4	28	2	86
	DK	16	10	6	35	0	87
	DE	14	2	2	29	0	89
	EE	7	7	6	29	0	91
	IE	31	0	22	21	1	91
	EL	3	1	3	7	0	97
	ES	69	1	5	12	2	91
	FR	12	1	3	21	1	88
	IT	9	1	2	14	0	92
	CY	3	2	14	10	1	96
	LV	5	5	17	15	1	90
	LT	5	1	6	23	3	89
	LU	12	2	3	25	0	94
	HU	2	0	2	15	3	89
	MT	12	2	27	15	0	95
	NL	15	1	5	30	0	88
	AT	9	2	3	35	1	87
	PL	3	1	8	13	3	92
	PT	20	1	4	15	4	87
	RO	5	1	2	8	4	93
	SI	4	0	2	69	0	61
	SK	4	1	1	15	1	90
	FI	13	7	3	24	1	91
	SE	15	57	4	28	0	88
	UK	20	0	46	32	1	83
	HR	3	0	1	84	4	29
	TR	0	0	0	96	1	6
	MK	0	1	0	72	3	41
	IS	18	7	12	79	0	55
	NO	21	12	10	64	1	64
	RS	2	1	0	78	0	38
	IL	9	0	4	49	10	52

Q6 Quelles sont les principales raisons pour lesquelles vous êtes parti(e) en vacances en 2011? (MAX. 3 RÉPONSES)

Q6 What were your main reasons for going on holidays in 2011? (MAX. 3 ANSWERS)

Q6 Was waren die Hauptgründe für Ihre Urlaubsreise/n im Jahr 2011? Maximal 3 Nennungen!

%	Soleil / plage Sun/beach Sonne/Strand	Repos / loisirs (y compris bien-être/cure de santé) Rest/recreation (including Wellness/health treatment) Sich ausruhen/nichts tun/Erholung (einschließlich Wellness/Gesundheitskur)	Passer du temps avec votre famille Spending time with your family Zeit mit der Familie verbringen	Visite d'une ville City trips Städtereisen	Pratique d'un sport (p. ex. plongée, cyclisme, etc…) Sports-related (e.g. scuba-diving, cycling etc…) Sport (z.B. Tauchen, Fahrradfahren etc.)
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	28	48	32	16	10
BE	23	44	32	16	13
BG	27	35	29	4	4
CZ	25	55	36	10	18
DK	28	28	47	17	14
DE	26	52	26	18	15
EE	23	32	33	7	7
IE	32	47	34	12	10
EL	30	65	30	9	5
ES	27	43	30	16	5
FR	29	45	38	19	10
IT	30	51	21	19	4
CY	8	70	21	4	5
LV	13	46	21	21	8
LT	19	39	25	25	7
LU	33	42	35	16	10
HU	22	61	32	18	7
MT	3	59	25	12	7
NL	30	45	36	16	14
AT	23	44	26	23	18
PL	20	52	37	21	8
PT	47	56	39	9	9
RO	20	53	32	9	5
SI	37	49	36	19	10
SK	25	49	28	11	8
FI	25	12	39	26	16
SE	32	34	38	13	13
UK	33	45	38	11	8
HR	25	37	30	10	10
TR	22	22	25	11	4
MK	39	56	25	2	6
IS	13	49	27	18	8
NO	41	35	40	19	8
RS	32	59	24	4	2
IL	11	44	42	12	8

Q6 Quelles sont les principales raisons pour lesquelles vous êtes parti(e) en vacances en 2011? (MAX. 3 RÉPONSES)

Q6 What were your main reasons for going on holidays in 2011? (MAX. 3 ANSWERS)

Q6 Was waren die Hauptgründe für Ihre Urlaubsreise/n im Jahr 2011? Maximal 3 Nennungen!

%	Nature (montagne, lac, paysage, etc…) / Nature (mountain, lake, landscape etc…) / Natur (Berge, Seen, Landschaft etc.)	Culture / religion / Culture / religion / Kultur/Religion	Visite d'amis / de membres de la famille / Visiting friends / relatives / Freunde/Verwandte besuchen	Autre (NE PAS LIRE) / Other (DO NOT READ OUT) / Andere (NICHT VORLESEN)	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	18	14	28	3	1
BE	22	22	24	1	1
BG	18	5	31	4	2
CZ	32	15	24	2	0
DK	24	18	25	3	0
DE	23	21	25	2	0
EE	22	18	49	6	1
IE	6	8	30	3	0
EL	13	5	30	5	0
ES	17	17	31	2	0
FR	18	11	36	1	1
IT	13	16	22	3	0
CY	7	6	27	10	0
LV	19	13	46	4	0
LT	18	10	31	4	0
LU	16	16	26	1	0
HU	15	9	26	5	0
MT	19	16	16	12	1
NL	27	22	26	1	0
AT	21	26	26	4	0
PL	22	8	28	3	2
PT	18	15	31	1	1
RO	12	6	32	5	1
SI	14	5	18	1	1
SK	19	10	26	1	2
FI	18	18	35	2	1
SE	13	13	39	3	1
UK	12	7	28	4	0
HR	13	11	38	5	1
TR	12	10	41	14	0
MK	13	6	20	3	0
IS	12	10	33	2	1
NO	15	10	29	3	1
RS	22	11	26	6	0
IL	27	12	21	5	2

Q7.1 Combien de fois avez-vous utilisé les moyens de transport suivants pour vous rendre à votre destination de vacances en 2011? (ENQ. : Un aller et retour doit être comptabilisé comme UNE FOIS)
Avion

Q7.1 How many times did you use the following means of transport to travel to your holiday destination in 2011…? (INT. : One back and forth should be counted as ONE TIME)
Airplane

Q7.1 Wie häufig haben Sie 2011 die folgenden Transportmittel genutzt, um zu Ihrem Urlaubsziel zu reisen? INT.: Eine einfache Hin- und Rückreise gilt als EINMALIGE Nutzung)
Flugzeug

	%	1	2	3	4	5 fois ou plus / 5 times or more / 5-mal oder häufiger	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
		Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	24	11	4	3	4	54	0
	BE	33	11	5	1	3	47	0
	BG	7	5	1	1	1	85	0
	CZ	18	5	1	1	2	73	0
	DK	30	17	7	3	5	37	1
	DE	26	11	4	2	4	53	0
	EE	32	11	3	1	6	47	0
	IE	33	22	11	5	10	19	0
	EL	19	8	3	3	5	62	0
	ES	24	11	4	2	6	53	0
	FR	20	10	3	2	3	62	0
	IT	19	11	5	3	3	58	1
	CY	33	19	13	5	7	23	0
	LV	24	12	6	4	4	49	1
	LT	14	11	2	3	3	67	0
	LU	31	17	7	4	7	34	0
	HU	11	4	1	0	1	83	0
	MT	53	27	5	5	3	7	0
	NL	28	13	6	3	2	48	0
	AT	28	11	5	3	4	49	0
	PL	15	4	2	1	2	75	1
	PT	21	10	4	1	3	61	0
	RO	10	6	2	2	3	77	0
	SI	13	6	3	1	3	74	0
	SK	16	7	2	1	1	73	0
	FI	27	16	9	5	7	36	0
	SE	32	14	9	6	6	33	0
	UK	32	16	7	6	7	32	0
	HR	8	4	3	2	2	81	0
	TR	11	7	3	5	5	69	0
	MK	7	7	1	1	0	84	0
	IS	32	22	9	3	11	23	0
	NO	24	20	11	7	15	22	1
	RS	13	3	0	0	0	84	0
	IL	33	21	5	4	8	28	1

Q7.2 Combien de fois avez-vous utilisé les moyens de transport suivants pour vous rendre à votre destination de vacances en 2011? (ENQ. : Un aller et retour doit être comptabilisé comme UNE FOIS)
Bateau

Q7.2 How many times did you use the following means of transport to travel to your holiday destination in 2011…? (INT. : One back and forth should be counted as ONE TIME)
Boat

Q7.2 Wie häufig haben Sie 2011 die folgenden Transportmittel genutzt, um zu Ihrem Urlaubsziel zu reisen? INT.: Eine einfache Hin- und Rückreise gilt als EINMALIGE Nutzung)
Schiff

		1	2	3	4	5 fois ou plus	Aucune/ zéro	Ne sait pas
		1	2	3	4	5 times or more	None/ zero	Don't know
		1	2	3	4	5-mal oder häufiger	Nie/Null	Weiß nicht
	%	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	**10**	**2**	**0**	**1**	**1**	**86**	**0**
	BE	**6**	**1**	**1**	**0**	**1**	**90**	**1**
	BG	**2**	**2**	**0**	**0**	**1**	**95**	**0**
	CZ	**7**	**1**	**0**	**0**	**1**	**91**	**0**
	DK	**14**	**4**	**2**	**1**	**3**	**75**	**1**
	DE	**9**	**3**	**0**	**1**	**0**	**87**	**0**
	EE	**20**	**14**	**4**	**3**	**7**	**52**	**0**
	IE	**13**	**5**	**1**	**0**	**0**	**81**	**0**
	EL	**26**	**7**	**2**	**2**	**3**	**60**	**0**
	ES	**8**	**1**	**0**	**1**	**1**	**89**	**0**
	FR	**8**	**1**	**0**	**0**	**1**	**90**	**0**
	IT	**10**	**2**	**0**	**0**	**1**	**86**	**1**
	CY	**8**	**2**	**0**	**0**	**1**	**89**	**0**
	LV	**10**	**8**	**1**	**0**	**1**	**80**	**0**
	LT	**5**	**1**	**0**	**0**	**1**	**93**	**0**
	LU	**9**	**3**	**1**	**0**	**0**	**87**	**0**
	HU	**5**	**2**	**0**	**0**	**0**	**93**	**0**
	MT	**21**	**2**	**0**	**1**	**1**	**73**	**2**
	NL	**11**	**1**	**0**	**0**	**1**	**86**	**1**
	AT	**7**	**1**	**0**	**0**	**1**	**91**	**0**
	PL	**3**	**1**	**1**	**0**	**0**	**94**	**1**
	PT	**3**	**2**	**0**	**0**	**2**	**93**	**0**
	RO	**3**	**3**	**0**	**0**	**2**	**92**	**0**
	SI	**7**	**1**	**0**	**0**	**1**	**90**	**1**
	SK	**5**	**1**	**0**	**0**	**0**	**94**	**0**
	FI	**25**	**12**	**3**	**3**	**3**	**54**	**0**
	SE	**20**	**6**	**2**	**1**	**3**	**67**	**1**
	UK	**15**	**3**	**0**	**1**	**0**	**81**	**0**
	HR	**15**	**5**	**3**	**3**	**4**	**70**	**0**
	TR	**8**	**4**	**1**	**1**	**3**	**82**	**1**
	MK	**10**	**0**	**0**	**0**	**0**	**90**	**0**
	IS	**12**	**1**	**1**	**1**	**2**	**83**	**0**
	NO	**18**	**8**	**2**	**2**	**4**	**66**	**0**
	RS	**2**	**0**	**0**	**0**	**1**	**97**	**0**
	IL	**6**	**2**	**0**	**0**	**2**	**88**	**2**

Q7.3 Combien de fois avez-vous utilisé les moyens de transport suivants pour vous rendre à votre destination de vacances en 2011? (ENQ. : Un aller et retour doit être comptabilisé comme UNE FOIS)
Train

Q7.3 How many times did you use the following means of transport to travel to your holiday destination in 2011…? (INT. : One back and forth should be counted as ONE TIME)
Train

Q7.3 Wie häufig haben Sie 2011 die folgenden Transportmittel genutzt, um zu Ihrem Urlaubsziel zu reisen? INT.: Eine einfache Hin- und Rückreise gilt als EINMALIGE Nutzung)
Zug

	%	1	2	3	4	5 fois ou plus / 5 times or more / 5-mal oder häufiger	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
		Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	12	7	3	2	5	71	0
	BE	9	4	3	1	3	80	0
	BG	7	6	4	1	8	74	0
	CZ	8	5	3	2	9	72	1
	DK	10	3	2	1	4	79	1
	DE	14	6	3	3	4	70	0
	EE	8	2	5	0	5	80	0
	IE	11	6	2	1	3	76	1
	EL	5	2	1	0	3	89	0
	ES	12	8	3	2	3	72	0
	FR	13	10	3	2	8	64	0
	IT	15	4	2	1	4	74	0
	CY	3	3	0	0	4	90	0
	LV	6	8	5	2	6	73	0
	LT	9	3	0	2	3	83	0
	LU	17	5	2	0	4	72	0
	HU	7	5	3	2	8	75	0
	MT	13	3	1	0	3	79	1
	NL	11	3	2	1	2	81	0
	AT	10	7	3	1	3	76	0
	PL	8	7	4	1	7	72	1
	PT	9	3	2	1	4	81	0
	RO	11	6	5	2	9	67	0
	SI	5	2	2	0	1	89	1
	SK	8	4	4	1	11	72	0
	FI	14	10	4	2	8	62	0
	SE	14	7	3	2	7	66	1
	UK	14	8	3	2	5	68	0
	HR	8	6	2	1	5	78	0
	TR	5	4	1	1	4	85	0
	MK	5	4	1	0	2	88	0
	IS	10	6	1	2	2	78	1
	NO	8	4	2	2	3	80	1
	RS	8	1	0	0	1	90	0
	IL	6	8	4	1	10	69	2

Q7.4 Combien de fois avez-vous utilisé les moyens de transport suivants pour vous rendre à votre destination de vacances en 2011? (ENQ. : Un aller et retour doit être comptabilisé comme UNE FOIS)
Autocar

Q7.4 How many times did you use the following means of transport to travel to your holiday destination in 2011…? (INT. : One back and forth should be counted as ONE TIME)
Bus

Q7.4 Wie häufig haben Sie 2011 die folgenden Transportmittel genutzt, um zu Ihrem Urlaubsziel zu reisen? INT.: Eine einfache Hin- und Rückreise gilt als EINMALIGE Nutzung)
Bus

%	1 / 1 / 1	2 / 2 / 2	3 / 3 / 3	4 / 4 / 4	5 fois ou plus / 5 times or more / 5-mal oder häufiger	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	9	4	2	1	4	80	0
BE	8	2	1	0	1	87	1
BG	13	7	5	3	14	58	0
CZ	17	5	2	1	11	64	0
DK	9	3	1	0	2	84	1
DE	11	4	1	1	1	82	0
EE	13	8	4	1	17	57	0
IE	9	5	2	1	4	79	0
EL	10	5	4	2	6	73	0
ES	9	4	3	2	4	78	0
FR	6	2	0	1	2	89	0
IT	8	2	1	0	1	88	0
CY	8	1	2	0	6	83	0
LV	11	11	7	5	14	52	0
LT	11	5	3	2	14	65	0
LU	16	2	1	0	1	80	0
HU	11	5	3	3	10	68	0
MT	23	5	0	1	3	67	1
NL	6	2	0	0	1	91	0
AT	9	4	2	1	2	82	0
PL	13	6	3	2	9	66	1
PT	10	4	1	1	5	79	0
RO	10	6	5	2	8	69	0
SI	12	3	1	0	2	81	1
SK	12	6	2	2	11	67	0
FI	12	7	2	2	7	70	0
SE	11	7	1	1	4	75	1
UK	10	5	1	2	4	78	0
HR	17	8	3	2	9	61	0
TR	18	14	5	4	23	34	2
MK	16	12	4	6	12	49	1
IS	9	6	0	1	4	79	1
NO	12	6	2	1	3	76	0
RS	31	5	3	2	4	55	0
IL	10	4	0	1	19	62	4

Q7.5 Combien de fois avez-vous utilisé les moyens de transport suivants pour vous rendre à votre destination de vacances en 2011? (ENQ. : Un aller et retour doit être comptabilisé comme UNE FOIS)
Voiture/moto

Q7.5 How many times did you use the following means of transport to travel to your holiday destination in 2011…? (INT. : One back and forth should be counted as ONE TIME)
Car/ Motorbikes

Q7.5 Wie häufig haben Sie 2011 die folgenden Transportmittel genutzt, um zu Ihrem Urlaubsziel zu reisen? INT.: Eine einfache Hin- und Rückreise gilt als EINMALIGE Nutzung)
Auto/Motorrad

%	1	2	3	4	5 fois ou plus / 5 times or more / 5-mal oder häufiger	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	25	14	8	6	25	21	1
BE	26	17	10	6	16	24	1
BG	13	9	7	5	48	17	1
CZ	25	14	8	3	29	20	1
DK	26	13	7	4	21	29	0
DE	28	17	9	8	17	21	0
EE	10	7	7	1	45	30	0
IE	22	11	9	5	18	35	0
EL	21	10	10	4	30	25	0
ES	20	15	8	8	33	15	1
FR	22	13	9	7	35	14	0
IT	35	15	7	5	15	23	0
CY	13	6	6	4	17	54	0
LV	12	8	7	3	43	27	0
LT	19	14	4	5	44	14	0
LU	29	21	10	3	14	23	0
HU	24	11	7	6	26	26	0
MT	21	4	1	2	2	69	1
NL	26	20	11	9	14	20	0
AT	31	16	9	6	22	16	0
PL	21	13	7	5	36	16	2
PT	21	12	10	6	36	15	0
RO	15	11	8	6	38	21	1
SI	27	13	13	6	33	8	0
SK	21	10	7	2	39	20	1
FI	11	12	6	4	47	19	1
SE	18	11	8	5	32	25	1
UK	24	14	7	7	17	31	0
HR	24	11	7	6	39	12	1
TR	14	7	6	5	30	37	1
MK	20	18	8	4	24	25	1
IS	17	10	10	7	41	13	2
NO	17	13	8	6	32	22	2
RS	37	9	4	2	11	37	0
IL	21	10	4	4	24	33	4

Q8.1 Au cours de l'année 2011, combien de fois êtes-vous parti(e) en vacances avec les formules suivantes?
Vacances "tout compris" (transport + logement + nourriture)

Q8.1 In 2011, how many times did you go on any of the following types of holiday?
All Inclusive holiday (transport + accommodation + food)

Q8.1 Wie häufig haben Sie 2011 auf folgende Arten Urlaub gemacht?
All-inclusive-Urlaub (An-und Abreise + Unterkunft + Verpflegung)

%	1	2	3	4	5 fois ou plus / 5 times or more / 5-mal oder häufiger	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	19	5	1	1	1	73	0
BE	23	7	3	0	1	65	1
BG	14	4	3	0	0	78	1
CZ	18	4	0	0	2	76	0
DK	20	3	1	0	1	74	1
DE	21	6	1	0	1	71	0
EE	17	4	1	0	2	75	1
IE	15	4	1	1	1	78	0
EL	18	4	1	1	4	72	0
ES	19	5	2	1	3	70	0
FR	16	4	1	1	1	76	1
IT	18	5	1	1	1	73	1
CY	22	11	3	2	2	60	0
LV	15	4	2	2	6	71	0
LT	15	6	0	0	3	73	3
LU	22	8	3	1	1	65	0
HU	15	4	2	1	2	75	1
MT	32	3	1	1	2	61	0
NL	17	3	1	0	0	79	0
AT	20	4	2	2	2	70	0
PL	15	4	1	0	1	78	1
PT	16	5	2	0	2	74	1
RO	18	4	1	0	1	76	0
SI	15	4	0	1	1	79	0
SK	15	3	1	0	1	79	1
FI	14	5	1	1	1	78	0
SE	14	1	1	0	1	82	1
UK	21	5	2	1	0	70	1
HR	9	5	1	0	2	83	0
TR	15	7	3	1	3	71	0
MK	17	4	5	0	2	72	0
IS	13	7	0	1	1	78	0
NO	17	3	1	2	2	74	1
RS	27	6	0	1	1	65	0
IL	22	8	2	0	2	62	4

Q8.2 Au cours de l'année 2011, combien de fois êtes-vous parti(e) en vacances avec les formules suivantes?
Séjour comprenant le transport et le logement

Q8.2 In 2011, how many times did you go on any of the following types of holiday?
Package Tour (transport + accommodation bought together)

Q8.2 Wie häufig haben Sie 2011 auf folgende Arten Urlaub gemacht?
Pauschalreise (An- und Abreise + Unterkunft zusammen gebucht)

%	1	2	3	4	5 fois ou plus / 5 times or more / 5-mal oder häufiger	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	15	5	1	1	1	77	0
BE	18	5	2	0	1	74	0
BG	10	4	0	1	1	84	0
CZ	15	4	1	1	2	77	0
DK	19	6	2	1	0	71	1
DE	19	8	2	1	1	69	0
EE	7	3	1	0	1	86	2
IE	16	3	1	1	0	78	1
EL	8	3	0	0	0	89	0
ES	13	4	1	1	1	80	0
FR	12	3	1	1	1	82	0
IT	9	2	0	1	1	86	1
CY	18	3	2	1	1	74	1
LV	15	5	2	1	2	75	0
LT	9	5	2	0	1	82	1
LU	19	9	4	2	2	64	0
HU	13	3	1	0	2	80	1
MT	13	3	0	1	3	80	0
NL	18	4	2	1	1	74	0
AT	24	6	3	2	1	64	0
PL	15	3	1	1	1	79	0
PT	6	3	1	0	1	88	1
RO	10	2	2	0	0	85	1
SI	16	6	3	1	1	73	0
SK	20	5	1	0	1	73	0
FI	21	7	2	1	1	68	0
SE	20	6	1	1	1	70	1
UK	18	5	1	1	0	74	1
HR	10	1	1	0	3	85	0
TR	8	1	0	0	1	89	1
MK	6	2	2	0	1	88	1
IS	18	4	1	0	0	76	1
NO	24	7	2	1	0	66	0
RS	10	1	0	0	1	87	1
IL	22	10	1	1	2	59	5

Q8.3 Au cours de l'année 2011, combien de fois êtes-vous parti(e) en vacances avec les formules suivantes?
Organisation séparée des différents services touristiques (par ex. transport, logement)

Q8.3 In 2011, how many times did you go on any of the following types of holiday?
Holidays where transport and accommodation are bought separately

Q8.3 Wie häufig haben Sie 2011 auf folgende Arten Urlaub gemacht?
Urlaub, bei dem Sie An- und Abreise und Unterkunft unabhängig voneinander organisiert haben

%	1 / 1 / 1	2 / 2 / 2	3 / 3 / 3	4 / 4 / 4	5 fois ou plus / 5 times or more / 5-mal oder häufiger	Aucune/ zéro / None/ zero / Nie/Null	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	22	11	6	3	7	50	1
BE	21	9	6	3	5	56	0
BG	17	9	6	1	5	62	0
CZ	31	13	7	2	7	39	1
DK	25	15	9	3	13	34	1
DE	25	14	9	5	10	36	1
EE	15	8	2	2	5	65	3
IE	33	14	9	4	9	30	1
EL	24	9	6	3	9	49	0
ES	18	9	5	3	6	58	1
FR	15	8	3	3	5	65	1
IT	26	11	7	2	8	45	1
CY	23	9	6	1	4	57	0
LV	16	6	4	5	5	64	0
LT	23	10	3	4	13	45	2
LU	19	12	8	1	5	55	0
HU	12	7	5	2	4	69	1
MT	27	13	5	2	2	51	0
NL	26	9	7	4	2	51	1
AT	18	14	7	4	8	48	1
PL	18	9	3	2	5	62	1
PT	16	7	5	2	5	64	1
RO	23	10	3	3	5	54	2
SI	22	12	5	3	15	43	0
SK	26	8	3	1	8	54	0
FI	20	9	6	4	10	50	1
SE	25	12	6	4	7	45	1
UK	23	13	7	5	7	44	1
HR	24	8	5	2	14	47	0
TR	15	8	3	1	4	69	0
MK	33	14	2	1	7	41	2
IS	28	11	5	2	7	45	2
NO	20	18	6	3	4	47	2
RS	37	7	3	1	2	50	0
IL	22	9	4	2	4	54	5

Q9 Avez-vous organisé vos vacances en 2011 à l'aide d'un des moyens suivants? (PLUSIEURS RÉPONSES POSSIBLES)

Q9 Did you arrange your holidays in 2011 using any of the following methods? (MULTIPLE ANSWER POSSIBLE)

Q9 Wie haben Sie 2011 Ihren Urlaub organisiert? (MEHRFACHNENNUNGEN MÖGLICH)

	Sur Internet The Internet Über das Internet	Par téléphone Over the phone Über das Telefon	Par le biais d'une agence de voyages Through a travel agency Über ein Reisebüro	Par le biais d'une personne que vous connaissez Through someone you know Über jemanden, den Sie kennen
%	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	53	18	23	22
BE	57	11	32	19
BG	30	16	11	23
CZ	40	17	29	33
DK	71	14	22	15
DE	54	20	28	19
EE	34	9	25	30
IE	77	18	22	18
EL	41	16	12	20
ES	52	11	25	14
FR	50	14	17	27
IT	48	10	21	18
CY	45	12	36	13
LV	52	16	18	40
LT	24	18	14	31
LU	54	12	39	15
HU	36	11	12	23
MT	61	3	27	16
NL	72	12	22	12
AT	51	17	34	22
PL	41	24	14	29
PT	43	22	24	34
RO	26	16	20	25
SI	35	14	33	25
SK	32	12	23	35
FI	70	30	20	23
SE	64	20	21	25
UK	68	29	28	21
HR	26	22	11	28
TR	22	21	10	26
MK	13	19	23	23
IS	58	11	11	20
NO	78	17	14	24
RS	17	11	29	35
IL	42	21	37	22

Q9 Avez-vous organisé vos vacances en 2011 à l'aide d'un des moyens suivants? (PLUSIEURS RÉPONSES POSSIBLES)

Q9 Did you arrange your holidays in 2011 using any of the following methods? (MULTIPLE ANSWER POSSIBLE)

Q9 Wie haben Sie 2011 Ihren Urlaub organisiert? (MEHRFACHNENNUNGEN MÖGLICH)

%	Au guichet d'une compagnie de transport (compagnie aérienne, société de chemin de fer, etc…) Over the counter of a transportation company (airline company, railway company etc…) Am Schalter eines Beförderungs-/Verkehrsunternehmens (Fluggesellschaft, Eisenbahnunternehmen etc.)	Sur place (sur votre lieu de vacances) On-site (place of holidays) Vor Ort (am Urlaubsort)	Autre (NE PAS LIRE) Other (DO NOT READ OUT) Andere (NICHT VORLESEN)	Ne sait pas Don't know Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	4	9	8	4
BE	5	12	3	3
BG	4	12	18	12
CZ	5	15	9	5
DK	5	6	7	2
DE	4	10	5	1
EE	8	17	21	5
IE	4	6	1	0
EL	4	15	16	3
ES	2	5	12	3
FR	5	11	13	5
IT	2	7	8	5
CY	0	3	8	3
LV	5	16	8	4
LT	3	21	13	5
LU	8	6	5	2
HU	3	3	22	10
MT	5	2	2	1
NL	2	14	5	2
AT	2	9	7	1
PL	4	10	9	10
PT	5	19	13	4
RO	1	13	11	7
SI	2	12	8	1
SK	3	10	10	10
FI	10	9	2	7
SE	5	9	5	4
UK	9	8	2	2
HR	15	7	15	6
TR	4	12	16	16
MK	3	27	10	3
IS	5	10	8	8
NO	4	5	3	2
RS	0	15	12	2
IL	6	9	9	7

Q10 Parmi les éléments suivants, lesquels vous inciteraient à retourner en vacances au même endroit? (MAX. 3 RÉPONSES)

Q10 Which of the following would make you go back to the same place for a holiday? (MAX. 3 ANSWERS)

Q10 Was würde Sie dazu veranlassen, am gleichen Ort erneut Urlaub zu machen? Maximal 3 Nennungen!

%	La qualité du logement The quality of the accommodation Die Qualität der Unterkunft	Les caractéristiques naturelles (climat, paysage, etc.) The natural features (weather conditions, landscape, etc.) Die Natur (Wetter, Landschaft etc.)	Le niveau général des prix The general level of prices Das allgemeine Preisniveau	Les activités proposées (diversité et richesse de l'offre touristique) The activities offered (variety and comprehensiveness of the tourist offer) Das Angebot an Aktivitäten (Vielfalt und Umfang touristischer Angebote)
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	32	50	27	17
BE	34	48	25	14
BG	26	50	30	9
CZ	36	65	22	22
DK	33	44	31	23
DE	36	52	25	20
EE	12	34	19	13
IE	43	45	39	25
EL	31	49	39	12
ES	35	50	27	15
FR	23	54	23	16
IT	20	49	21	10
CY	25	40	29	12
LV	24	36	23	20
LT	24	49	30	12
LU	36	45	24	13
HU	28	46	25	8
MT	17	53	25	22
NL	41	58	22	17
AT	36	48	24	23
PL	29	53	32	22
PT	40	54	32	15
RO	32	42	25	12
SI	33	44	24	20
SK	33	50	19	15
FI	31	36	32	32
SE	33	44	25	28
UK	48	48	33	19
HR	29	42	29	22
TR	30	40	37	13
MK	20	24	14	7
IS	20	43	28	39
NO	37	44	30	23
RS	31	42	33	10
IL	31	33	39	17

Q10 Parmi les éléments suivants, lesquels vous inciteraient à retourner en vacances au même endroit? (MAX. 3 RÉPONSES)

Q10 Which of the following would make you go back to the same place for a holiday? (MAX. 3 ANSWERS)

Q10 Was würde Sie dazu veranlassen, am gleichen Ort erneut Urlaub zu machen? Maximal 3 Nennungen!

%	L'accueil des touristes (p. ex. convivialité pour les enfants, attention accordée aux clients, acceptation des animaux de compagnie, etc…) / How tourists are welcomed (e.g. child friendliness, customer care, "pets-welcomed" policy, etc…) / Die Touristenfreundlichkeit (z.B. Kinderfreundlichkeit, Urlauberbetreuung, ob Haustiere mitgebracht werden dürfen etc.)	Autre (NE PAS LIRE) / Other (DO NOT READ OUT) / Andere (NICHT VORLESEN)	Ne sait pas / Don't know / Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	24	8	10
BE	25	7	12
BG	18	8	10
CZ	26	4	9
DK	30	7	9
DE	23	9	10
EE	12	27	21
IE	28	3	5
EL	17	11	6
ES	20	9	7
FR	27	9	8
IT	22	8	15
CY	15	21	6
LV	23	10	18
LT	17	9	13
LU	25	9	10
HU	21	13	15
MT	23	12	9
NL	19	8	10
AT	28	9	10
PL	27	3	10
PT	29	10	15
RO	21	6	18
SI	28	8	6
SK	19	6	12
FI	23	4	11
SE	25	10	10
UK	28	5	5
HR	19	12	8
TR	19	7	13
MK	19	5	40
IS	25	5	11
NO	21	10	9
RS	7	15	17
IL	23	9	19

36

Q11.1 En ce qui concerne vos principales vacances en 2011, dans quelle mesure avez-vous été satisfait(e) de…?
La qualité du logement

Q11.1 Now thinking about your main holidays in 2011, how satisfied were you with…?
The quality of the accommodation

Q11.1 Wie zufrieden waren Sie in Ihrem Haupturlaub 2011 mit …?
Der Qualität der Unterkunft

%	Très satisfait(e) / Very satisfied / Sehr zufrieden	Plutôt satisfait(e) / Fairly satisfied / Ziemlich zufrieden	Plutôt pas satisfait(e) / Not very satisfied / Nicht sehr zufrieden	Pas du tout satisfait(e) / Not at all satisfied / Überhaupt nicht zufrieden	Ne sait pas / Don't know / Weiß nicht	Total 'Satisfait'e)' / Total 'Satisfied' / Total 'Zufrieden'	Total 'Pas satisfait(e)' / Total 'Not satisfied'' / Total 'Nicht zufrieden'
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	56	37	2	1	4	93	3
BE	64	33	1	1	1	97	2
BG	38	41	6	1	14	79	7
CZ	54	38	3	0	5	92	3
DK	72	22	2	1	3	94	3
DE	62	34	2	1	1	96	3
EE	54	31	2	1	12	85	3
IE	62	32	2	1	3	94	3
EL	32	47	8	2	11	79	10
ES	52	40	3	2	3	92	5
FR	50	43	2	1	4	93	3
IT	48	43	4	1	4	91	5
CY	59	30	3	1	7	89	4
LV	44	51	3	0	2	95	3
LT	41	50	4	1	4	91	5
LU	62	33	2	1	2	95	3
HU	55	36	1	1	7	91	2
MT	69	25	4	0	2	94	4
NL	58	34	3	1	4	92	4
AT	68	28	2	1	1	96	3
PL	51	41	1	1	6	92	2
PT	45	49	2	0	4	94	2
RO	43	45	6	0	6	88	6
SI	64	32	3	0	1	96	3
SK	53	36	3	0	8	89	3
FI	45	50	2	1	2	95	3
SE	60	33	2	0	5	93	2
UK	67	27	2	1	3	94	3
HR	59	32	5	1	3	91	6
TR	26	45	8	5	16	71	13
MK	69	29	1	1	0	98	2
IS	71	23	4	0	2	94	4
NO	53	40	3	1	3	93	4
RS	76	19	2	1	2	95	3
IL	48	38	4	2	8	86	6

Q11.2 En ce qui concerne vos principales vacances en 2011, dans quelle mesure avez-vous été satisfait(e) de...?
Les caractéristiques naturelles (climat, paysage, etc.)

Q11.2 Now thinking about your main holidays in 2011, how satisfied were you with...?
The natural features (weather conditions, landscape, etc;)

Q11.2 Wie zufrieden waren Sie in Ihrem Haupturlaub 2011 mit ...?
Der Natur (Wetter, Landschaft etc.)

	Très satisfait(e) Very satisfied Sehr zufrieden	Plutôt satisfait(e) Fairly satisfied Ziemlich zufrieden	Plutôt pas satisfait(e) Not very satisfied Nicht sehr zufrieden	Pas du tout satisfait(e) Not at all satisfied Überhaupt nicht zufrieden	Ne sait pas Don't know Weiß nicht	Total 'Satisfait'e)' Total 'Satisfied' Total 'Zufrieden'	Total 'Pas satisfait(e)' Total 'Not satisfied'' Total 'Nicht zufrieden'
%	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	65	29	3	1	2	94	4
BE	70	25	2	1	2	95	3
BG	62	27	2	1	8	89	3
CZ	66	28	3	1	2	94	4
DK	73	19	3	1	4	92	4
DE	73	23	3	0	1	96	3
EE	67	23	2	0	8	90	2
IE	67	29	2	1	1	96	3
EL	56	38	3	1	2	94	4
ES	69	26	2	1	2	95	3
FR	59	34	3	2	2	93	5
IT	64	31	3	0	2	95	3
CY	72	24	1	1	2	96	2
LV	54	37	8	0	1	91	8
LT	63	33	3	0	1	96	3
LU	63	32	3	1	1	95	4
HU	71	20	3	0	6	91	3
MT	75	18	5	1	1	93	6
NL	68	26	3	1	2	94	4
AT	77	19	2	1	1	96	3
PL	53	36	5	2	4	89	7
PT	54	42	3	0	1	96	3
RO	55	34	6	0	5	89	6
SI	75	21	3	0	1	96	3
SK	67	23	4	1	5	90	5
FI	51	44	2	0	3	95	2
SE	62	31	3	1	3	93	4
UK	69	26	2	1	2	95	3
HR	69	23	5	1	2	92	6
TR	31	46	6	6	11	77	12
MK	78	21	1	0	0	99	1
IS	71	21	2	1	5	92	3
NO	51	43	3	0	3	94	3
RS	81	14	2	1	2	95	3
IL	53	34	5	0	8	87	5

Q11.3 En ce qui concerne vos principales vacances en 2011, dans quelle mesure avez-vous été satisfait(e) de…?
Le niveau général des prix

Q11.3 Now thinking about your main holidays in 2011, how satisfied were you with…?
The general level of prices

Q11.3 Wie zufrieden waren Sie in Ihrem Haupturlaub 2011 mit …?
Dem allgemeinen Preisniveau

%	Très satisfait(e) / Very satisfied / Sehr zufrieden	Plutôt satisfait(e) / Fairly satisfied / Ziemlich zufrieden	Plutôt pas satisfait(e) / Not very satisfied / Nicht sehr zufrieden	Pas du tout satisfait(e) / Not at all satisfied / Überhaupt nicht zufrieden	Ne sait pas / Don't know / Weiß nicht	Total 'Satisfait'e)' / Total 'Satisfied' / Total 'Zufrieden'	Total 'Pas satisfait(e)' / Total 'Not satisfied'' / Total 'Nicht zufrieden'
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	28	54	11	2	5	82	13
BE	42	50	5	1	2	92	6
BG	18	49	18	4	11	67	22
CZ	22	58	13	1	6	80	14
DK	45	43	5	1	6	88	6
DE	35	55	6	1	3	90	7
EE	25	47	8	2	18	72	10
IE	35	54	7	1	3	89	8
EL	15	46	27	7	5	61	34
ES	28	50	15	2	5	78	17
FR	20	57	13	4	6	77	17
IT	18	61	15	2	4	79	17
CY	35	52	7	2	4	87	9
LV	18	58	19	3	2	76	22
LT	18	51	22	4	5	69	26
LU	30	57	10	0	3	87	10
HU	32	45	13	1	9	77	14
MT	34	49	13	2	2	83	15
NL	39	49	5	1	6	88	6
AT	43	48	6	1	2	91	7
PL	19	59	13	2	7	78	15
PT	12	67	16	2	3	79	18
RO	15	52	21	5	7	67	26
SI	26	57	15	1	1	83	16
SK	28	49	14	2	7	77	16
FI	23	62	9	2	4	85	11
SE	28	57	6	0	9	85	6
UK	39	52	5	1	3	91	6
HR	24	42	26	5	3	66	31
TR	15	34	26	9	16	49	35
MK	39	50	9	1	1	89	10
IS	23	48	17	7	5	71	24
NO	26	64	5	0	5	90	5
RS	52	34	9	0	5	86	9
IL	26	49	11	4	10	75	15

Q11.4 En ce qui concerne vos principales vacances en 2011, dans quelle mesure avez-vous été satisfait(e) de…?
Les activités proposées (diversité et richesse de l'offre touristique)

Q11.4 Now thinking about your main holidays in 2011, how satisfied were you with…?
The activities offered (variety and comprehensiveness of the tourist offer)

Q11.4 Wie zufrieden waren Sie in Ihrem Haupturlaub 2011 mit …?
Dem Angebot an Aktivitäten (Vielfalt und Umfang touristischer Angebote)

%	Très satisfait(e) / Very satisfied / Sehr zufrieden	Plutôt satisfait(e) / Fairly satisfied / Ziemlich zufrieden	Plutôt pas satisfait(e) / Not very satisfied / Nicht sehr zufrieden	Pas du tout satisfait(e) / Not at all satisfied / Überhaupt nicht zufrieden	Ne sait pas / Don't know / Weiß nicht	Total 'Satisfait'e)' / Total 'Satisfied' / Total 'Zufrieden'	Total 'Pas satisfait(e)' / Total 'Not satisfied'' / Total 'Nicht zufrieden'
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	36	43	5	2	14	79	7
BE	44	41	3	4	8	85	7
BG	25	43	12	3	17	68	15
CZ	42	40	5	1	12	82	6
DK	53	28	4	1	14	81	5
DE	44	40	4	0	12	84	4
EE	41	29	4	0	26	70	4
IE	44	40	4	1	11	84	5
EL	17	48	14	5	16	65	19
ES	36	38	6	4	16	74	10
FR	29	50	6	3	12	79	9
IT	22	49	8	2	19	71	10
CY	40	41	8	2	9	81	10
LV	30	46	11	3	10	76	14
LT	29	46	10	1	14	75	11
LU	37	47	5	2	9	84	7
HU	34	33	5	0	28	67	5
MT	54	24	8	1	13	78	9
NL	40	36	5	1	18	76	6
AT	56	30	4	0	10	86	4
PL	34	51	4	1	10	85	5
PT	22	57	9	3	9	79	12
RO	27	52	10	3	8	79	13
SI	46	40	9	0	5	86	9
SK	38	38	9	2	13	76	11
FI	38	50	4	0	8	88	4
SE	48	34	2	1	15	82	3
UK	44	38	3	1	14	82	4
HR	42	30	16	5	7	72	21
TR	23	35	15	8	19	58	23
MK	47	40	4	3	6	87	7
IS	61	29	4	0	6	90	4
NO	33	45	5	0	17	78	5
RS	72	19	2	0	7	91	2
IL	30	41	8	3	18	71	11

Q11.5 En ce qui concerne vos principales vacances en 2011, dans quelle mesure avez-vous été satisfait(e) de...?
L'accueil des touristes (p. ex. convivialité pour les enfants, attention accordée aux clients, acceptation des animaux de compagnie, etc.)

Q11.5 Now thinking about your main holidays in 2011, how satisfied were you with...?
How tourists are welcomed (e.g. child friendliness, customer care, "pets-welcomed" policy, etc)

Q11.5 Wie zufrieden waren Sie in Ihrem Haupturlaub 2011 mit ...?
Der Touristenfreundlichkeit (z.B. Kinderfreundlichkeit, Urlauberbetreuung, ob Haustiere mitgebracht werden dürfen etc.)

%	Très satisfait(e) Very satisfied Sehr zufrieden	Plutôt satisfait(e) Fairly satisfied Ziemlich zufrieden	Plutôt pas satisfait(e) Not very satisfied Nicht sehr zufrieden	Pas du tout satisfait(e) Not at all satisfied Überhaupt nicht zufrieden	Ne sait pas Don't know Weiß nicht	Total 'Satisfait'e)' Total 'Satisfied' Total 'Zufrieden'	Total 'Pas satisfait(e)' Total 'Not satisfied'' Total 'Nicht zufrieden'
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	47	38	4	1	10	85	5
BE	55	38	2	1	4	93	3
BG	35	37	10	1	17	72	11
CZ	46	41	5	0	8	87	5
DK	66	23	3	0	8	89	3
DE	56	35	2	0	7	91	2
EE	38	30	3	0	29	68	3
IE	61	33	2	1	3	94	3
EL	30	44	11	3	12	74	14
ES	41	38	5	4	12	79	9
FR	36	52	3	1	8	88	4
IT	35	42	5	1	17	77	6
CY	49	37	5	1	8	86	6
LV	42	46	4	1	7	88	5
LT	39	45	6	1	9	84	7
LU	45	38	7	2	8	83	9
HU	53	31	2	0	14	84	2
MT	61	31	4	0	4	92	4
NL	50	38	4	0	8	88	4
AT	65	28	3	1	3	93	4
PL	43	42	3	0	12	85	3
PT	29	51	7	1	12	80	8
RO	35	45	10	2	8	80	12
SI	65	27	4	2	2	92	6
SK	53	31	5	1	10	84	6
FI	41	50	1	1	7	91	2
SE	51	33	2	1	13	84	3
UK	60	29	3	1	7	89	4
HR	45	34	11	1	9	79	12
TR	25	34	13	5	23	59	18
MK	66	24	4	2	4	90	6
IS	50	38	3	0	9	88	3
NO	43	41	4	1	11	84	5
RS	80	14	2	0	4	94	2
IL	35	40	5	3	17	75	8

Q12 Parmi les sources d'information suivantes, lesquelles sont les plus importantes à vos yeux lorsque vous prenez une décision sur vos projets de vacances? (MAX. 3 RÉPONSES)

Q12 From the following information sources, which one do you consider to be the most important when you make a decision about your travel plans? (MAX. 3 ANSWERS)

Q12 Welche der folgenden Informationsquellen halten Sie für am wichtigsten, wenn Sie eine Entscheidung über Ihre Reisepläne treffen? Maximal 3 Nennungen!

%	Votre expérience personnelle Personal experience Persönliche Erfahrung	Les recommandations d'amis, de collègues ou de membres de votre famille Recommendations of friends, colleagues or relatives Empfehlungen von Freunden, Kollegen oder Verwandten	Les guides et les magazines payants Paid for guidebooks and magazines Käuflich erworbene Reiseführer und Zeitschriften
	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	32	52	7
BE	27	48	6
BG	32	53	1
CZ	44	61	4
DK	30	55	8
DE	33	51	10
EE	27	55	2
IE	33	59	7
EL	33	51	4
ES	29	54	5
FR	26	55	9
IT	26	35	4
CY	29	40	5
LV	31	66	5
LT	26	61	1
LU	30	43	6
HU	35	52	5
MT	25	39	6
NL	30	48	10
AT	30	54	11
PL	36	63	5
PT	32	62	11
RO	28	51	4
SI	42	56	5
SK	37	55	3
FI	35	48	6
SE	33	60	9
UK	37	55	7
HR	41	61	3
TR	22	53	3
MK	32	32	2
IS	41	56	6
NO	40	55	8
RS	45	45	2
IL	26	51	8

Q12 Parmi les sources d'information suivantes, lesquelles sont les plus importantes à vos yeux lorsque vous prenez une décision sur vos projets de vacances? (MAX. 3 RÉPONSES)

Q12 From the following information sources, which one do you consider to be the most important when you make a decision about your travel plans? (MAX. 3 ANSWERS)

Q12 Welche der folgenden Informationsquellen halten Sie für am wichtigsten, wenn Sie eine Entscheidung über Ihre Reisepläne treffen? Maximal 3 Nennungen!

%	Les catalogues et les prospectus gratuits Free catalogues, brochures Kostenlose Kataloge, Broschüren	Les sites Internet Internet websites Webseiten im Internet	Les sites de médias sociaux Social media sites Soziale Medien/ Soziale Netzwerke im Internet
	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	11	40	5
BE	17	40	2
BG	3	28	3
CZ	15	49	2
DK	13	55	5
DE	14	41	7
EE	3	51	6
IE	8	42	4
EL	6	37	8
ES	6	38	5
FR	11	41	2
IT	8	40	3
CY	11	33	12
LV	12	44	5
LT	6	36	3
LU	16	38	3
HU	9	36	3
MT	19	42	4
NL	18	56	8
AT	16	42	5
PL	9	41	4
PT	10	32	6
RO	5	24	5
SI	15	26	5
SK	11	40	2
FI	13	59	7
SE	10	50	11
UK	13	39	4
HR	7	33	2
TR	8	30	5
MK	3	21	11
IS	13	51	4
NO	9	49	7
RS	3	7	1
IL	9	38	4

Q12 Parmi les sources d'information suivantes, lesquelles sont les plus importantes à vos yeux lorsque vous prenez une décision sur vos projets de vacances? (MAX. 3 RÉPONSES)

Q12 From the following information sources, which one do you consider to be the most important when you make a decision about your travel plans? (MAX. 3 ANSWERS)

Q12 Welche der folgenden Informationsquellen halten Sie für am wichtigsten, wenn Sie eine Entscheidung über Ihre Reisepläne treffen? Maximal 3 Nennungen!

%	Les agences de voyage / touristiques Travel / tourist agencies Reisebüros/Tourismusagenturen	Les journaux, la radio et la télévision Newspaper, radio, TV Die Medien (Zeitung, Radio, TV)	Autre (NE PAS LIRE) Other (DO NOT READ OUT) Andere (NICHT VORLESEN)	Ne sait pas Don't know Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	16	7	2	4
BE	20	5	2	7
BG	7	10	2	5
CZ	13	8	1	3
DK	10	11	2	4
DE	22	8	1	3
EE	14	7	4	12
IE	8	11	0	1
EL	13	10	3	5
ES	24	5	2	2
FR	12	8	4	5
IT	22	3	2	5
CY	20	7	3	2
LV	10	10	1	4
LT	9	13	1	6
LU	23	5	4	3
HU	5	7	4	8
MT	18	12	2	4
NL	14	6	2	3
AT	27	7	2	3
PL	7	7	1	4
PT	22	13	3	8
RO	16	9	2	7
SI	17	7	2	2
SK	14	7	2	4
FI	8	13	1	3
SE	10	12	2	4
UK	10	5	1	3
HR	11	9	2	5
TR	9	15	2	8
MK	12	9	1	17
IS	6	6	1	3
NO	7	6	2	2
RS	15	3	4	15
IL	13	9	2	14

Q13 En 2012, quel type de vacances avez-vous l'intention de prendre? (PLUSIEURS RÉPONSES POSSIBLES)

Q13 In 2012, which of the following type of holidays do you plan to take? (MULTIPLE ANSWER POSSIBLE)

Q13 Welche Arten von Urlaub planen Sie für 2012? (MEHRFACHNENNUNGEN MÖGLICH)

%	Vacances de plus de 13 nuitées consécutives / Holidays with more than 13 consecutive nights / Urlaub mit mehr als 13 aufeinanderfolgenden Übernachtungen	Vacances de 4 à 13 nuitées consécutives / Holidays between 4 and 13 consecutive nights / Urlaub mit 4 bis 13 aufeinanderfolgende Übernachtungen	Séjour de courte durée (max. 3 nuitées) / Short-stay trip (up to 3 nights) / Kurzurlaub (bis zu 3 Übernachtungen)
	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	19	41	27
BE	18	43	26
BG	5	34	31
CZ	12	50	26
DK	20	53	22
DE	23	46	25
EE	11	29	24
IE	23	52	33
EL	10	23	28
ES	15	32	28
FR	26	38	17
IT	13	34	16
CY	11	39	16
LV	10	24	42
LT	9	32	35
LU	29	40	16
HU	4	24	33
MT	7	32	11
NL	39	48	30
AT	19	45	28
PL	14	40	32
PT	11	27	28
RO	9	33	31
SI	17	55	22
SK	10	45	21
FI	18	48	44
SE	24	49	30
UK	26	55	43
HR	15	39	29
TR	11	23	36
MK	13	37	15
IS	15	36	19
NO	35	55	31
RS	8	24	5
IL	14	29	29

Q13 En 2012, quel type de vacances avez-vous l'intention de prendre? (PLUSIEURS RÉPONSES POSSIBLES)

Q13 In 2012, which of the following type of holidays do you plan to take? (MULTIPLE ANSWER POSSIBLE)

Q13 Welche Arten von Urlaub planen Sie für 2012? (MEHRFACHNENNUNGEN MÖGLICH)

		Vous n'avez pas encore décidé (NE PAS LIRE) No decisions yet (DO NOT READ OUT) Noch keine Entscheidung getroffen (NICHT VORLESEN)	Pas de vacances (NE PAS LIRE) No trip at all (DO NOT READ OUT) Überhaupt kein Urlaub geplant (NICHT VORLESEN)	Ne sait pas Don't know Weiß nicht
	%	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	12	15	2
	BE	10	17	4
	BG	11	18	4
	CZ	6	15	3
	DK	20	8	1
	DE	10	15	1
	EE	25	19	2
	IE	9	7	0
	EL	18	25	1
	ES	11	18	4
	FR	16	12	2
	IT	20	20	2
	CY	23	13	2
	LV	13	17	1
	LT	13	15	2
	LU	17	7	2
	HU	14	29	1
	MT	23	26	2
	NL	8	9	1
	AT	8	13	1
	PL	8	13	2
	PT	15	27	4
	RO	12	17	1
	SI	8	13	1
	SK	10	16	2
	FI	6	8	0
	SE	13	7	1
	UK	9	10	1
	HR	8	16	1
	TR	10	18	4
	MK	18	22	1
	IS	32	4	2
	NO	8	2	1
	RS	17	45	2
	IL	12	9	16

Q14 Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14 In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14 In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	En [NOTRE PAYS] / In [OUR COUNTRY] / In [UNSER LAND]	Autriche / Austria / Österreich	Belgique / Belgium / Belgien	Bulgarie / Bulgaria / Bulgarien	Chypre / Cyprus / Zypern	République tchèque / Czech Republic / Tschechische Republik	Danemark / Denmark / Dänemark	Estonie / Estonia / Estland
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	52	3	1	1	0	1	1	0
BE	13	2	0	1	0	0	0	0
BG	73	1	0	0	0	0	0	0
CZ	45	4	0	1	0	0	0	0
DK	35	6	1	1	0	1	0	0
DE	42	10	1	1	0	1	3	0
EE	40	1	0	1	0	1	2	0
IE	30	2	1	1	1	1	1	1
EL	80	2	0	1	2	0	0	0
ES	68	1	1	0	0	0	0	0
FR	58	1	1	0	0	0	0	0
IT	60	1	1	0	0	1	0	0
CY	30	2	0	0	0	2	0	0
LV	38	2	1	0	0	0	0	7
LT	53	2	0	0	0	0	1	2
LU	2	8	6	0	0	1	1	1
HU	63	6	0	2	0	0	0	0
MT	3	2	2	0	1	1	0	0
NL	26	8	5	1	0	0	1	0
AT	47	0	0	0	1	0	1	0
PL	66	2	0	1	0	2	0	0
PT	63	1	0	0	0	1	0	0
RO	57	3	0	4	0	0	0	0
SI	30	5	0	1	0	1	0	0
SK	43	4	0	8	1	7	0	0
FI	49	1	0	1	0	1	2	11
SE	53	2	1	0	1	0	4	1
UK	42	1	1	1	2	1	0	0
HR	77	5	1	1	0	2	0	0
TR	80	1	0	1	0	0	0	0
MK	26	3	0	5	0	0	0	0
IS	50	1	1	0	0	1	12	0
NO	36	1	0	1	0	1	10	0
RS	33	3	0	2	0	2	0	0
IL	31	3	1	0	0	1	0	0

Q14 Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14 In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14 In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	Finlande Finland Finnland	France France Frankreich	Allemagne Germany Deutschland	Grèce Greece Griechenland	Hongrie Hungary Ungarn	Irlande Ireland Irland	Italie Italy Italien	Lettonie Latvia Lettland
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	0	6	3	4	1	1	7	0
BE	0	35	6	4	0	0	9	0
BG	0	3	1	11	0	0	3	0
CZ	0	4	4	6	1	0	11	0
DK	1	10	10	5	1	1	13	0
DE	0	6	0	3	1	1	14	0
EE	14	3	4	1	1	2	4	5
IE	1	11	3	2	0	0	7	0
EL	0	3	3	0	1	0	4	0
ES	0	5	3	1	0	0	5	0
FR	0	0	2	1	0	1	3	0
IT	1	6	3	5	0	0	0	0
CY	1	7	3	36	1	0	8	0
LV	3	5	5	1	0	2	6	0
LT	1	2	6	1	0	2	4	4
LU	2	22	10	1	0	2	16	0
HU	0	2	4	6	0	1	6	0
MT	1	8	4	2	0	0	30	0
NL	1	18	12	4	1	1	13	0
AT	0	4	8	4	2	1	21	0
PL	0	2	3	3	1	1	5	0
PT	0	7	1	0	0	0	4	0
RO	0	4	5	6	2	0	10	0
SI	1	4	2	3	1	0	8	0
SK	1	3	2	7	3	1	10	0
FI	0	5	6	4	1	0	4	0
SE	3	7	6	5	1	1	8	1
UK	0	10	2	6	0	2	4	0
HR	0	2	3	1	1	1	5	0
TR	0	3	3	1	0	0	2	0
MK	0	1	3	13	0	0	3	0
IS	0	4	7	2	2	0	6	0
NO	0	7	2	5	1	0	7	0
RS	0	1	5	19	1	0	3	0
IL	0	7	5	2	2	1	7	0

Q14 Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14 In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14 In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	Lituanie / Lithuania / Litauen	Luxembourg / Luxembourg / Luxemburg	Malte / Malta / Malta	Pays-Bas / Netherlands / Niederlande	Pologne / Poland / Polen	Portugal / Portugal / Portugal	Roumanie / Romania / Rumänien	Slovaquie / Slovakia / Slowakei
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	0	0	0	1	1	1	0	1
BE	0	0	0	5	1	2	0	0
BG	0	0	0	0	0	0	0	0
CZ	0	0	0	1	1	0	0	10
DK	0	0	1	1	1	1	0	0
DE	0	0	0	3	2	1	0	0
EE	2	0	1	1	1	0	0	0
IE	0	0	1	1	3	7	0	0
EL	0	0	0	2	0	0	1	0
ES	0	0	0	1	0	2	0	0
FR	0	0	1	0	0	2	0	0
IT	0	0	0	1	0	1	1	0
CY	0	0	0	4	0	0	1	0
LV	8	0	0	1	3	3	0	1
LT	0	0	0	1	2	0	0	0
LU	0	0	0	3	1	20	0	1
HU	0	0	0	0	0	0	5	0
MT	0	0	0	3	1	0	0	0
NL	0	1	0	0	0	3	0	0
AT	0	0	0	0	1	1	0	0
PL	0	0	0	1	0	1	0	2
PT	0	1	0	1	0	0	0	0
RO	0	0	0	1	0	0	0	0
SI	0	0	0	1	0	1	0	0
SK	0	0	0	1	0	1	1	0
FI	0	0	0	2	1	1	0	0
SE	1	0	0	1	1	1	0	0
UK	0	0	1	2	1	2	0	0
HR	0	0	0	1	1	1	0	0
TR	0	0	0	0	0	0	0	0
MK	0	0	0	0	0	0	0	0
IS	0	0	0	2	1	1	0	0
NO	0	0	0	1	1	1	0	0
RS	0	0	0	1	0	0	0	0
IL	0	0	0	3	0	0	0	0

Q14 Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14 In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14 In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

		Slovénie	Espagne	Suède	Royaume Uni	Dans un autre pays en dehors de l'UE	Ne sait pas	Dans l'EU
		Slovenia	Spain	Sweden	United Kingdom	In another country outside the EU	Don't know	In the EU
		Slowenien	Spanien	Schweden	Vereinigtes Königreich	In einem anderen Land außerhalb der EU	Weiß nicht	Dans l'EU
	%	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	0	10	1	3	23	7	37
	BE	0	17	0	2	28	9	65
	BG	0	2	0	1	10	6	21
	CZ	1	5	0	3	24	11	41
	DK	0	17	10	7	34	2	60
	DE	0	15	2	2	33	1	53
	EE	1	5	4	2	26	11	43
	IE	1	26	1	14	21	9	59
	EL	0	2	0	2	8	1	20
	ES	0	0	1	4	13	7	21
	FR	0	7	0	2	22	11	19
	IT	0	8	1	2	16	7	26
	CY	0	8	0	12	8	7	72
	LV	1	6	11	10	19	10	54
	LT	0	7	2	6	19	6	35
	LU	0	15	2	3	24	8	80
	HU	1	2	0	2	9	9	30
	MT	2	3	1	27	14	16	70
	NL	0	12	3	4	29	9	59
	AT	1	8	1	2	34	7	45
	PL	0	5	1	4	14	7	28
	PT	0	14	0	1	15	7	25
	RO	0	6	0	2	9	7	36
	SI	0	3	0	1	55	9	25
	SK	1	5	0	1	18	6	45
	FI	0	10	10	2	20	12	44
	SE	0	12	0	4	31	5	46
	UK	0	18	0	0	31	10	43
	HR	4	3	0	2	15	3	25
	TR	0	2	0	1	11	5	11
	MK	0	3	1	0	37	13	31
	IS	0	15	5	9	26	3	46
	NO	0	18	8	6	30	8	51
	RS	0	2	1	0	41	4	36
	IL	0	5	1	3	27	18	33

Q14A Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14A In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14A In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

	%	Autriche / Austria / Österreich	Belgique / Belgium / Belgien	Bulgarie / Bulgaria / Bulgarien	Chypre / Cyprus / Zypern	République tchèque / Czech Republic / Tschechische Republik	Danemark / Denmark / Dänemark	Estonie / Estonia / Estland	Finlande / Finland / Finnland
		Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
	EU 27	4	1	2	1	2	1	0	1
	BE	2	13	1	0	0	0	0	0
	BG	1	0	73	0	0	0	0	0
	CZ	4	0	1	0	45	0	0	0
	DK	6	1	1	0	1	35	0	1
	DE	10	1	1	0	1	3	0	0
	EE	1	0	1	0	1	2	40	14
	IE	2	1	1	1	1	1	1	1
	EL	2	0	1	2	0	0	0	0
	ES	1	1	0	0	0	0	0	0
	FR	1	1	0	0	0	0	0	0
	IT	1	1	0	0	1	0	0	1
	CY	2	0	0	30	2	0	0	1
	LV	2	1	0	0	0	0	7	3
	LT	2	0	0	0	0	1	2	1
	LU	8	6	0	0	1	1	1	2
	HU	6	0	2	0	0	0	0	0
	MT	2	2	0	1	1	0	0	1
	NL	8	5	1	0	0	1	0	1
	AT	47	0	0	1	0	1	0	0
	PL	2	0	1	0	2	0	0	0
	PT	1	0	0	0	1	0	0	0
	RO	3	0	4	0	0	0	0	0
	SI	5	0	1	0	1	0	0	1
	SK	4	0	8	1	7	0	0	1
	FI	1	0	1	0	1	2	11	49
	SE	2	1	0	1	0	4	1	3
	UK	1	1	1	2	1	0	0	0
	HR	5	1	1	0	2	0	0	0
	TR	1	0	1	0	0	0	0	0
	MK	3	0	5	0	0	0	0	0
	IS	1	1	0	0	1	12	0	0
	NO	1	0	1	0	1	10	0	0
	RS	3	0	2	0	2	0	0	0
	IL	3	1	0	0	1	0	0	0

Q14A Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14A In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14A In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	France / France / Frankreich	Allemagne / Germany / Deutschland	Grèce / Greece / Griechenland	Hongrie / Hungary / Ungarn	Irlande / Ireland / Irland	Italie / Italy / Italien	Lettonie / Latvia / Lettland	Lituanie / Lithuania / Litauen
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	13	10	5	2	1	13	0	1
BE	35	6	4	0	0	9	0	0
BG	3	1	11	0	0	3	0	0
CZ	4	4	6	1	0	11	0	0
DK	10	10	5	1	1	13	0	0
DE	6	42	3	1	1	14	0	0
EE	3	4	1	1	2	4	5	2
IE	11	3	2	0	30	7	0	0
EL	3	3	80	1	0	4	0	0
ES	5	3	1	0	0	5	0	0
FR	58	2	1	0	1	3	0	0
IT	6	3	5	0	0	60	0	0
CY	7	3	36	1	0	8	0	0
LV	5	5	1	0	2	6	38	8
LT	2	6	1	0	2	4	4	53
LU	22	10	1	0	2	16	0	0
HU	2	4	6	63	1	6	0	0
MT	8	4	2	0	0	30	0	0
NL	18	12	4	1	1	13	0	0
AT	4	8	4	2	1	21	0	0
PL	2	3	3	1	1	5	0	0
PT	7	1	0	0	0	4	0	0
RO	4	5	6	2	0	10	0	0
SI	4	2	3	1	0	8	0	0
SK	3	2	7	3	1	10	0	0
FI	5	6	4	1	0	4	0	0
SE	7	6	5	1	1	8	1	1
UK	10	2	6	0	2	4	0	0
HR	2	3	1	1	1	5	0	0
TR	3	3	1	0	0	2	0	0
MK	1	3	13	0	0	3	0	0
IS	4	7	2	2	0	6	0	0
NO	7	2	5	1	0	7	0	0
RS	1	5	19	1	0	3	0	0
IL	7	5	2	2	1	7	0	0

Q14A Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14A In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14A In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	Luxembourg / Luxembourg / Luxemburg	Malte / Malta / Malta	Pays-Bas / Netherlands / Niederlande	Pologne / Poland / Polen	Portugal / Portugal / Portugal	Roumanie / Romania / Rumänien	Slovaquie / Slovakia / Slowakei	Slovénie / Slovenia / Slowenien
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	0	0	2	6	2	3	1	0
BE	0	0	5	1	2	0	0	0
BG	0	0	0	0	0	0	0	0
CZ	0	0	1	1	0	0	10	1
DK	0	1	1	1	1	0	0	0
DE	0	0	3	2	1	0	0	0
EE	0	1	1	1	0	0	0	1
IE	0	1	1	3	7	0	0	1
EL	0	0	2	0	0	1	0	0
ES	0	0	1	0	2	0	0	0
FR	0	1	0	0	2	0	0	0
IT	0	0	1	0	1	1	0	0
CY	0	0	4	0	0	1	0	0
LV	0	0	1	3	3	0	1	1
LT	0	0	1	2	0	0	0	0
LU	2	0	3	1	20	0	1	0
HU	0	0	0	0	0	5	0	1
MT	0	3	3	1	0	0	0	2
NL	1	0	26	0	3	0	0	0
AT	0	0	0	1	1	0	0	1
PL	0	0	1	66	1	0	2	0
PT	1	0	1	0	63	0	0	0
RO	0	0	1	0	0	57	0	0
SI	0	0	1	0	1	0	0	30
SK	0	0	1	0	1	1	43	1
FI	0	0	2	1	1	0	0	0
SE	0	0	1	1	1	0	0	0
UK	0	1	2	1	2	0	0	0
HR	0	0	1	1	1	0	0	4
TR	0	0	0	0	0	0	0	0
MK	0	0	0	0	0	0	0	0
IS	0	0	2	1	1	0	0	0
NO	0	0	1	1	1	0	0	0
RS	0	0	1	0	0	0	0	0
IL	0	0	3	0	0	0	0	0

Q14A Dans quel(s) pays avez-vous l'intention de passer vos vacances en 2012? (NE PAS LIRE - PLUSIEURS REPONSES POSSIBLES)

Q14A In which country(ies) do you plan to spend your holidays in 2012? (DO NOT READ OUT - MULTIPLE ANSWERS POSSIBLE)

Q14A In welchem Land/welchen Ländern planen Sie, 2012 Ihren Urlaub zu verbringen? (NICHT VORLESEN - MEHRFACHNENNUNGEN MÖGLICH)

%	Espagne / Spain / Spanien	Suède / Sweden / Schweden	Royaume Uni / United Kingdom / Vereinigtes Königreich	Dans un autre pays en dehors de l'UE / In another country outside the EU / In einem anderen Land außerhalb der EU	Ne sait pas / Don't know / Weiß nicht	Dans l'EU / In the EU / Dans l'EU
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	**16**	**2**	**9**	**23**	**7**	**79**
BE	**17**	**0**	**2**	**28**	**9**	**73**
BG	**2**	**0**	**1**	**10**	**6**	**89**
CZ	**5**	**0**	**3**	**24**	**11**	**77**
DK	**17**	**10**	**7**	**34**	**2**	**80**
DE	**15**	**2**	**2**	**33**	**1**	**81**
EE	**5**	**4**	**2**	**26**	**11**	**74**
IE	**26**	**1**	**14**	**21**	**9**	**80**
EL	**2**	**0**	**2**	**8**	**1**	**95**
ES	**68**	**1**	**4**	**13**	**7**	**83**
FR	**7**	**0**	**2**	**22**	**11**	**73**
IT	**8**	**1**	**2**	**16**	**7**	**81**
CY	**8**	**0**	**12**	**8**	**7**	**89**
LV	**6**	**11**	**10**	**19**	**10**	**81**
LT	**7**	**2**	**6**	**19**	**6**	**81**
LU	**15**	**2**	**3**	**24**	**8**	**81**
HU	**2**	**0**	**2**	**9**	**9**	**86**
MT	**3**	**1**	**27**	**14**	**16**	**73**
NL	**12**	**3**	**4**	**29**	**9**	**77**
AT	**8**	**1**	**2**	**34**	**7**	**77**
PL	**5**	**1**	**4**	**14**	**7**	**84**
PT	**14**	**0**	**1**	**15**	**7**	**83**
RO	**6**	**0**	**2**	**9**	**7**	**87**
SI	**3**	**0**	**1**	**55**	**9**	**52**
SK	**5**	**0**	**1**	**18**	**6**	**80**
FI	**10**	**10**	**2**	**20**	**12**	**79**
SE	**12**	**53**	**4**	**31**	**5**	**83**
UK	**18**	**0**	**42**	**31**	**10**	**72**
HR	**3**	**0**	**2**	**84**	**3**	**25**
TR	**2**	**0**	**1**	**88**	**5**	**11**
MK	**3**	**1**	**0**	**61**	**13**	**31**
IS	**15**	**5**	**9**	**72**	**3**	**46**
NO	**18**	**8**	**6**	**62**	**8**	**51**
RS	**2**	**1**	**0**	**70**	**4**	**36**
IL	**5**	**1**	**3**	**57**	**18**	**33**

Q15 La situation économique actuelle a-t-elle eu une influence sur vos projets de vacances pour 2012? (3 RÉPONSES POSSIBLES)

Q15 Has the current economic situation had an impact on your holiday plans for 2012? (3 ANSWERS POSSIBLE)

Q15 Hat die derzeitige Wirtschaftslage Auswirkungen auf Ihre Urlaubsplanung für 2012 gehabt? (3 NENNUNGEN MÖGLICH)

%	Cela n'a pas modifié mes projets de vacances It has not changed my planned holiday Die Wirtschaftslage hat nicht zu einer Änderung meiner Urlaubspläne geführt	Je partirai en vacances mais j'ai changé de destination I will go on holiday but I changed my destinations Ich werde in den Urlaub fahren, habe aber die Reiseziele geändert	Je partirai en vacances mais moins longtemps I will go on holiday but for a shorter period Ich werde in den Urlaub fahren, allerdings für einen kürzeren Zeitraum
	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	40	4	12
BE	39	3	11
BG	22	3	19
CZ	40	6	13
DK	74	3	4
DE	71	3	5
EE	36	4	11
IE	28	10	21
EL	7	3	27
ES	22	4	17
FR	35	3	13
IT	21	2	16
CY	21	7	19
LV	33	3	14
LT	38	5	12
LU	46	8	10
HU	21	6	18
MT	30	2	7
NL	59	3	6
AT	69	2	5
PL	40	3	12
PT	13	7	12
RO	20	3	19
SI	52	4	16
SK	33	7	13
FI	72	1	3
SE	65	5	7
UK	45	7	8
HR	23	4	19
TR	14	3	10
MK	18	13	19
IS	37	6	9
NO	73	3	2
RS	24	3	7
IL	23	11	17

Q15 La situation économique actuelle a-t-elle eu une influence sur vos projets de vacances pour 2012? (3 RÉPONSES POSSIBLES)

Q15 Has the current economic situation had an impact on your holiday plans for 2012? (3 ANSWERS POSSIBLE)

Q15 Hat die derzeitige Wirtschaftslage Auswirkungen auf Ihre Urlaubsplanung für 2012 gehabt? (3 NENNUNGEN MÖGLICH)

%	Je partirai en vacances mais je dépenserai moins I will go on holiday but I will spend less Ich werde in den Urlaub fahren, aber weniger ausgeben	Je ne partirai pas en vacances I will not go on holidays Ich werde nicht in den Urlaub fahren	Je ne pars pas en vacances (NE PAS LIRE) I do not go on holidays (DO NOT READ OUT) Ich fahre nie in den Urlaub (NICHT VORLESEN)	Je n'ai pas encore de projets de vacances pour 2012 (NE PAS LIRE) I didn't plan my holyday for 2012 (DO NOT READ OUT) Ich habe meinen Urlaub für 2012 nicht geplant (NICHT VORLESEN)	Ne sait pas Don't know Weiß nicht
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	22	15	3	6	3
BE	20	16	4	7	5
BG	20	28	2	6	4
CZ	22	16	2	4	3
DK	10	4	1	4	2
DE	9	6	1	3	2
EE	19	5	9	14	9
IE	38	10	0	3	3
EL	33	32	2	10	1
ES	30	23	2	5	3
FR	25	14	3	6	3
IT	29	19	5	7	6
CY	32	11	3	15	4
LV	29	18	0	5	4
LT	20	18	3	6	4
LU	22	7	4	5	3
HU	25	17	5	15	4
MT	9	20	7	21	7
NL	16	7	2	8	3
AT	10	5	2	4	3
PL	21	17	1	5	4
PT	31	37	3	6	3
RO	26	23	5	7	3
SI	23	7	2	4	1
SK	22	18	3	4	6
FI	14	6	1	3	1
SE	11	4	1	7	4
UK	26	10	3	4	3
HR	35	19	2	4	3
TR	20	43	2	8	3
MK	20	11	14	18	2
IS	34	5	1	10	7
NO	9	1	1	6	5
RS	17	18	16	19	2
IL	22	15	2	5	20

Q15A La situation économique actuelle a-t-elle eu une influence sur vos projets de vacances pour 2012? (3 RÉPONSES POSSIBLES)

Q15A Has the current economic situation had an impact on your holiday plans for 2012? (3 ANSWERS POSSIBLE)

Q15A Hat die derzeitige Wirtschaftslage Auswirkungen auf Ihre Urlaubsplanung für 2012 gehabt? (3 NENNUNGEN MÖGLICH)

%	Partirons en vacances / Are going on holiday / Partirons en vacances	Partirons en vacances mais ont changé leurs projets / Are going on holiday but changed their plans / Partirons en vacances mais ont changé leurs projets	Ne partirons pas en vacances / Are not going on holiday / Ne partirons pas en vacances	NSP/SR / DK/NA / NSP/SR
	Flash EB 334	Flash EB 334	Flash EB 334	Flash EB 334
EU 27	40	33	18	9
BE	39	29	20	12
BG	23	37	30	10
CZ	40	34	18	8
DK	74	15	5	6
DE	71	16	7	6
EE	36	27	14	23
IE	28	56	10	6
EL	6	48	35	11
ES	22	45	25	8
FR	35	37	18	10
IT	20	42	24	14
CY	21	46	14	19
LV	33	40	18	9
LT	38	31	21	10
LU	46	35	11	8
HU	21	38	22	19
MT	30	15	27	28
NL	59	21	9	11
AT	69	17	8	6
PL	40	33	18	9
PT	12	39	40	9
RO	20	43	27	10
SI	53	33	8	6
SK	33	37	20	10
FI	72	17	7	4
SE	65	19	5	11
UK	44	35	14	7
HR	23	49	21	7
TR	13	30	45	12
MK	18	37	25	20
IS	37	40	6	17
NO	73	14	2	11
RS	24	21	34	21
IL	23	37	16	24