From: Shweta Sahjwani
Date: Tuesday, 4 March 2014 10:00
To: Cherine Mohsen Chalaby , Christine Willett
Subject: CPE Comment for .Hotel application (Application ID: 1-1032-95136)

Dear Mr Chalaby, Ms Willett,

Please find attached a comment on the community application for .Hotel by Hotel Top-Level Domain S.a.r.l (Application ID: 1-1032-95136).

Request you to kindly forward this communication to the appointed CPE Panel for this application, and also post it as public correspondence.

I sincerely hope that these comments will provide the concerned Panelist/s with some useful perspective in the decision making process.

Thank you.

Warm regards,

Shweta Sahjwani
Manager, Strategic Partnerships
Radix Registry Tel : +91 (22) 3079 7500 Extn: 8522 Fax : +91 (22) 3079 7508
Skype: shwetasahjwani

Community Priority Evaluation (CPE) Comment: Hotel Top-Level Domain S.a.r.l's application for .Hotel (Application ID: 1-1032-95136)

Introduction

- Due to the fact that a successfully rated Community Application achieves supremacy over other applications for the same string, strict interpretation of AGB is required by the Community Priority Evaluation panel.

- From the AGB §4.2.3

  o It should be noted that "a qualified community application eliminates all directly contending standard applications, regardless of how well qualified the latter may be. This is a fundamental reason for very stringent requirements for qualification of a community-based application."

  o The scoring process is conceived to identify qualified community-based applications, while preventing "false positives" (awarding undue priority to an application that refers to a "community" construed merely to get a sought-after generic word as a gTLD string).

- "The threshold for winning is intentionally set with a view to prevent gaming attempts and identifying true Community applications. The risk for "false negatives" in the scoring can be moderated by a lowering of the threshold, but this has to be balanced against an increased risk for "false positives". In cases of generic words submitted as Community based strings, test runs by [ICANN] staff have also shown that the threshold is difficult to attain…" (See, http://www.icann.org/en/topics/new-gtlds/agv1-analysis-public-comments-18feb09-en.pdf.)

- The generically worded TLD name, .hotel, does not clearly identify a community, nor does a cohesive "global hotel community" exist. "[A]finding by the panel that an application does not meet the scoring threshold to prevail in a community priority evaluation is not necessarily an indication the community itself is in some way inadequate or invalid." Applicant Guidebook §4.2.3

- .hotel is a generic word. ICANN specifically states that the community process should not be abused by applicants to get a sought-after generic word as a gTLD string. The scoring is set to be rigorous to prevent gaming and abuses. (see, http://www.icann.org/en/topics/new-gtlds/summary-analysis-proposed-final-guidebook-21feb11-en.pdf, p.117)

- The applicant is manufacturing the existence of a "global hotel community" so that they may get priority. This is a rational act on the part of the applicant, a low cost gamble with a great benefit if it succeeds.

The application does not meet the required criteria, starting with the fact that there is no such thing as a "global hotel community"

Introduction

- The "community" identified by the applicant in their application for .hotel is the "global hotel community".

- We submit –

    o There is no "community" called the "global hotel community"

    o Hotels are part of a hotel sector or an industry but it is NOT a community

Our Arguments

1. AGB § 4.2.3 - definition of community

- The ICANN test for what constitutes a community is well defined in the AGB and must be strictly interpreted.

- From Section 4.2.3 in the AGB under criterion 1 Definitions

    o Definition of "Community": Usage of the expression "community" has evolved considerably from its Latin origin – "communitas" meaning "fellowship" – while still implying more of cohesion than a mere commonality of interest. Notably, as "community" is used throughout the application, there should be: (a) an awareness and recognition of a community among its members; (b) some understanding of the community's existence prior to September 2007 (when the new gTLD policy recommendations were completed); and (c) extended tenure or longevity—non-transience—into the future.

1.1 Cohesion

- Evident from the above, ICANN intended for a "community" to imply "more of cohesion" than a "mere commonality of interest"

- "Cohesion" is defined in the dictionary as "the act or state of cohering; tendency to unite; 1670s, from L. cohæsus, pp. of cohærere "to stick together"

- By this definition, according to ICANN, there would be a "global hotel community" if all hotels around the world cohere or tend to unite or stick together.

- The Panel should note that the applicant' application does not assert or demonstrate any "cohesion" between most hotels around the world, let alone every single hotel in the world.

- Hotels may have common interests, but they do not "tend to stick together".

1.2 Awareness and Recognition

- To prove that the alleged "global hotel community" is a "community", there needs to be "an awareness and recognition of a community" among its "members".

- Firstly the definition presupposes the existence of "members". The dictionary definition of the word "member" states - "A distinct part of a whole"

- Hence a "hotel" would qualify as a "member" of an alleged "global hotel community" if it was a "distinct part" of such a community

- Just being a hotel does not make it a "member" of an alleged "community"

- Additionally ICANN states that - for there to exist a "global hotel community" there must exist among global hotels, an awareness and recognition of such a community (i.e. an awareness of cohesion)

- There is no evidence existing or presented by the applicant of any such "awareness and recognition" amongst any hotels, let alone amongst all the 100,000+ hotels in the world, of the existence of a "global hotel community" of which they are "members".

- The applicant itself has used the words "hotel industry" and "hotel community" interchangeably throughout its application. The existence of a hotel industry does not connote that there exists a "global hotel community".

1.3 Existence prior to 2007

- To prove that the alleged "global hotel community" is a "community", there needs to be "some understanding of the COMMUNITY's existence prior to September 2007".

- The applicant has not provided any evidence of the existence of a "global hotel COMMUNITY" prior to 2007, or ever for that matter.

2. Summary

- We do not believe that the applicant has established the existence of a "global hotel community". In order to demonstrate the existence of a "global hotel community", as per the AGB, the applicant must demonstrate:

    - Cohesion amongst all the hotels in the world and evidence that they tend to unite and stick together for a common cause world over

    - Awareness and recognition amongst hotels that they are actually members of such an alleged "community"

    - Recognition locally and globally amongst the public at large of the existence of a global hotel community

- The applicant has not provided any evidence to prove the above

- We submit that as per the AGB there is no "global hotel community"

- From § 4.2.3 in the AGB under criterion 1 Guidelines:

    - With respect to "Delineation" and "Extension," it should be noted that a community can consist of legal entities (for example, an association of suppliers of a particular service), of individuals (for example, a language community) or of a logical alliance of communities (for example, an international federation of national communities of a similar nature). **All are viable as such, provided the requisite awareness and recognition of the community is at hand among the members. Otherwise the application would be seen as not relating to a real community and score 0 on both "Delineation" and "Extension."**

- Consequent to the fact that the "requisite awareness and recognition of the community" does not exist among the purported members, this application should not be seen as relating to a real community. And therefore should score 0 on both "Delineation" and "Extension".

- For the purpose of argument, even assuming that the application is seen as relating to a real community, it should not pass the CPE process, as is demonstrated in the analysis contained in Annex 1 below, a copy of which may already be in the CPE Panelist's possession.

- We fully support the analysis and believe that it is a true representation of the scoring for the application based on the applicable AGB rules, in the situation that the Panelist adjudicates that the application relates to a real community.

Annex 1

HOTEL Top-Level-Domain S.a.r.l's Application for .hotel Comment to Community Priority Evaluation

Introduction

This evaluation of the HOTEL Top-Level-Domain S.a.r.l's ("Hotel TLD") community priority application for .hotel (Application ID 1-1032-95136) is offered to the Community Priority Evaluation (CPE) Panel in the hope that it will be of use. It has been stated in various venues that CPE-related letters submitted to ICANN and to the public comment forum would be directed to the relevant CPE Panel.

It must be underscored that, if the rules set forth in the Applicant Guidebook (AGB) are followed, many community priority applications for generic strings will fail—and rightly so—given that ICANN has set the entry barrier quite high. So high that, out of 16 possible points, if an applicant loses more than 2, it is _not a community_ as contemplated by the AGB and must fail CPE. This barrier is so strict because the danger of having a TLD claiming to serve a community for which the community either does not exist or does not agree to the applicant who has claimed it will represent that community is so high. As will be shown below, the Hotel TLD application will not have sufficient points to pass CPE.

The AGB is a document created by the ICANN multistakeholder community over many years of drafts and conversations. The AGB as it stands was agreed to by all applicants by virtue of their applications and must be adhered to.

Although this evaluation is offered by a party with vested business interests in this discussion, it is offered in the spirit of the multistakeholder model. It must be insisted upon that all CPE Panels rely solely on the rigorous criteria put forth in the AGB.

Hotel TLD is claiming a very generic term as its community name and the CPE process was designed to prevent this. As would be expected, Hotel TLD's application does not pass our evaluation, scoring only 9 of the 14 points necessary. Here is a summary of the key areas of concern:

Analysis

The CPE is comprised of four criteria, each of them divided into sub-sections that are individually evaluated. They are:

+ Community Establishment
+ Nexus between Proposed String and Community
+ Registration Policies
+ Community Endorsement[1]

Each of the sub-sections is scored on a basis from 0–4 points, allowing the possibility of scoring a maximum of 16 points overall. 14 points are required to successfully pass CPE.[2]

The Panel is respectfully reminded that the AGB was relied upon by all applicants and the Panel must rely exclusively to the AGB for information regarding how to come to a decision regarding the Hotel TLD application for .hotel. While the CPE Panel may rely on some level of outside research, this remains undefined and information regarding the definitions of and criteria for qualifying as a community under the AGB must come solely from the AGB itself. evaluation criteria published by ICANN in the AGB.

Criterion 1: Community Establishment; Score: 2

Summary

Out of 4 possible points for Criterion 1, Hotel TLD merits at most only 2.

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[1] _New gTLD Applicant Guidebook_, Version 2012-06-04 ("_AGB_"), §4.2.3.
[2] _Id._

Criteria

A maximum of 4 points is possible on the Community Establishment criterion, or 2 points each for "Delineation" and "Extension". To receive the full 2 points for Delineation, the AGB states that an application must invoke a "clearly delineated, organized, and pre-existing community." For 1 point, the application must be clearly delineated and pre-existing but insufficiently for 2 full points. To score 2 points for Extension, a community must be "of considerable size and longevity". To score 1 point for Extension, a community must have either considerable size or longevity.[3]

"Community" as defined by the AGB requires that there be

> (a) an awareness and recognition of a community among its members; (b) some understanding of the community's existence prior to September 2007 (when the new gTLD policy recommendations were completed); and (c) extended tenure or longevity—non-transience—into the future.[4]

Hotel TLD's application, however, allows into the so-called "community" establishments that are not hotels—such as marketing organizations—and *excludes* from the "community" establishments that *are* hotels, such as bed-and-breakfasts.

Despite this definition, the AGB awards no points for the length of the community's existence—past or future.

Analysis

Delineation

To receive the full 2 points for delineation, the AGB states that an application must invoke a "clearly delineated, organized, and pre-existing community." For 1 point, the application must be clearly delineated and pre-existing but insufficiently for 2 full points.

Hotel TLD's application proclaims that is "intended exclusively to serve the global Hotel Community".[5] Delineation relates to the "membership of a community, where a clear and straight-forward membership definition scores high, while an unclear, dispersed or unbound definition scores low."[6] At first glance, this seems appropriate, however, Hotel TLD goes on to define hotels as "[e]stablishment[s] with reception, services and additional facilities where accommodation and in most cases meals are available."[7] Under this definition, bed-and-breakfasts fall firmly into the category of "hotels" yet there is no allowance for them to join the "community" TLD since, while some may be members of inn and hotel associations, they are not regulated in the same way as hotels and need not be members of any association in order to operate.[8]

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[3] *Id.* The CPE Panel is once again encouraged and instructed to refer to the AGB for further definitions provided by ICANN for the explicit purpose of determining whether an applicant meets the strict criteria necessary to pass CPE.

[4] *Id.*

[5] Public portion of HOTEL Top-Level-Domain S.a.r.l.'s application for .hotel ("Hotel TLD's Application"), available at https://gtldresult.icann.org/application-result/applicationstatus/applicationdetails/1562. Last accessed 20 February 2014. Answer to Question 18(a): Describe the mission/purpose of your proposed gTLD.

[6] *AGB*, §4.2.3.

[7] Hotel TLD's Application. Answer to Question 18(b): How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

[8] Wikipedia entry on "Bed and breakfast". Available at: http://en.wikipedia.org/wiki/Bed_and_breakfast. Last accessed 20 February 2014. Section on "Regulations" and "Professional and trade associations".

In addition, the licensing and requirements of hotels worldwide varies from jurisdiction to jurisdiction. This can be seen from the GAC[9] Early Warnings[10] issued by Germany and France, respectively. For example, France's GAC representative stated that any application for .hotel must be closed and restricted only to hotel businesses.[11] France made this comment on all applications for .hotel *except* that of Hotel TLD.[12]Germany's GAC representative, however, stressed that any .hotel TLD *not* be restricted, stating that to do so would be anticompetitive in nature.[13] Such vast differences are evident between countries so close to one another—and both members of the EU—let alone the differences between countries globally.

Finally, Hotel TLD defines the list of businesses who would be eligible for domain names in their .hotel namespace and it includes, bafflingly, marketing agencies.[14] Indeed, *any* company that "represents" a hotel is eligible for membership,[15] from accountants to lobbyists. It beggars belief that these institutions would be eligible for .hotel domain names but family-run bed and breakfasts would not be.

Hotel TLD must score 0 for Delineation.

Extension
To score 2 points for Extension, a community must be "of considerable size and longevity". To score 1 point for Extension, a community must have either considerable size or longevity.[16]

Assuming, for the moment, that the "community" defined by Hotel TLD can be considered a community for the purposes of scoring under Extension, Hotel TLD has defined a community of considerable size—indeed it encompasses the entire globe, despite the many differences nationally and in countries where the concept defined by Hotel TLD is not represented by the word "hotel".

Hotel TLD scores 2 points for Extension.

Score
Based on the manner in which Hotel TLD has described the "community" it purports to represent, Hotel TLD can score no more than 2 for Criterion 1. This is because it cannot score any for Delineation, as discussed above, because it disallows certain classes of institution that fall into its definition and allows nearly anyone vaguely associated with a hotel.

Criterion 2: Nexus between Proposed String and Community – Score: 2

Summary
Out of 4 possible points for Criterion 2, Hotel TLD merits only 2.

Criteria

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[9] Governmental Advisory Committee to the ICANN Board. The GAC is relied upon by the ICANN Board for guidance and advice and, for the New gTLD Programme, was in a unique position to delay, halt, or encourage applications via "Early Warnings".

[10] See ICANNWiki entry on "GAC" at http://icannwiki.com/index.php/GAC#Early_Warnings. Last accessed 20 February 2014.

[11] GAC Early Warning – France – Hotel: Hotel-FR-25198.pdf, *et al*. Available at https://gacweb.icann.org/display/gacweb/GAC+Early+Warnings. Last accessed 20 February 2014.

[12] GAC Early Warnings. Available at https://gacweb.icann.org/display/gacweb/GAC+Early+Warnings. Last accessed 20 February 2014.

[13] GAC Early Warning – Germany – Hotel: Hotel-DE-95136.pdf, *et al*. Available at https://gacweb.icann.org/display/gacweb/GAC+Early+Warnings. Last accessed 20 February 2014.

[14] Hotel TLD's Application. Answer to Question 18(b). Five categories of "exclusive" membership in the supposed .hotel "community" are listed. The third category includes "Marketing organizations".

[15] *Id*. The fifth category includes any "Other Organizations representing Hotels".

[16] *AGB*, §4.2.3.

A maximum of 4 points is possible on the Nexus between Proposed String and Community criterion, or 3 points for "Nexus" and 1 point for "Uniqueness". To receive the full 3 points for Nexus, the AGB states that an the applied-for string must "match[…] the name of the community or […be] a well-known short-form or abbreviation of the community". To score 2 points for Nexus, the string must identify the community. There is no ability to score 1 point for Nexus. To score 1 point for Uniqueness, the applied-for string must have "no other significant meaning beyond identifying the community described in the application".[17]

Analysis

Uniqueness

To receive the full 3 points for Nexus, the AGB states that an the applied-for string must "match[…] the name of the community or […be] a well-known short-form or abbreviation of the community".[18]

Here, the word "hotel" does indeed refer to hotels—at least in some languages—though not to the "community" that Hotel TLD seeks to create, which includes marketing agencies[19] any anyone who represents hotels.[20] Since Hotel TLD allows these non-hotel entities into it's supposed .hotel "community", it cannot score highly for uniqueness. Surely, no one thinks of tax preparers when one hears the word "hotel", yet this is exactly who the TLD would be "restricted to" under Hotel TLD's application.[21]

Hotel TLD scores 2 points for Uniqueness.

Nexus

To score 1 point for Nexus, the applied-for string must have "no other significant meaning beyond identifying the community described in the application".[22]

As shown above, the Hotel TLD "community" encompasses multiple parties that no one would otherwise associate with .hotel, keeping the TLD from describing the "community" it claims to create and represent.

Hotel TLD scores 0 points for Nexus.

Score

Because of the manner in which Hotel TLD has chosen to "restrict" its TLD, it can score no more than 2 points for Criterion 2: Nexus between Proposed String and Community. This is because the word "hotel" does not naturally refer to people who merely "represent" hotels in other industries.

Criterion 3: Registration Policies; Score: 1

Summary

Out of 4 possible points for Criterion 3, Hotel TLD merits only 1.

Criteria

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[17] *Id.*

[18] *Id.*

[19] Hotel TLD's Application. Answer to Question 18(b).

[20] An enterprising law firm could easily cash in on the respect that a .hotel domain name conveys by purchasing law.hotel after representing a hotel in a brief contract negotiation.

[21] Hotel TLD's Application. Answer to Question 18(b).

[22] *AGB*, §4.2.3.

A maximum of 4 points is possible on the Registration Policies criterion, or 1 point each for Eligibility, Name Selection, Content and Use, and Enforcement. To receive 1 point for Eligibility, eligibility for registration in Hotel TLD's .hotel namespace must be "restricted to community members". To receive 1 point for Name Selection, Hotel TLD must institute "[p]olicies [that] include name selection rules consistent with the articulated community-based purpose of the" string. To receive 1 point for Content and Use, Hotel TLD's [p]olicies include rules for content and use consistent with the articulated community-based purpose of" .hotel. To receive 1 point for Enforcement, Hotel TLD's "[p]olicies [must] include specific enforcement measures".[23]

Analysis

Eligibility

To receive 1 point for Eligibility, eligibility for registration in Hotel TLD's .hotel namespace must be "restricted to community members".[24] In its answer to Question 20, Hotel TLD addresses how it defines its "community" "for registration purposes":

> According to DIN EN ISO 18513:2003, "A hotel is an establishment with services and additional facilities where accommodation and in most cases meals are available."[25]

Hotel TLD states that it will conduct "registrant eligibility verification"[26] but does not discuss what that verification will consist of.[27] Assuming, for the moment, that its verification is successful, Hotel TLD will allow hotels, marketing agencies, or law firms to register domains in its .hotel TLD. While this is exactly what it defines to be in its "community", it is *not* what is defined by "hotel".

Hotel TLD must score 0 for Eligibility.

Name Selection

To receive 1 point for Name Selection, Hotel TLD must institute "[p]olicies [that] include name selection rules consistent with the articulated community-based purpose of the" string.[28]

Hotel TLD's only discussion of name selection restrictions indicate that it will follow ICANN's requirements to restrict registrations. Otherwise, it states that it will place no limitation on names in its .hotel space.[29]

Hotel TLD must score 0 for Name Selection.

Content and Use

To receive 1 point for Content and Use, the Hotel TLD's [p]olicies include rules for content and use consistent with the articulated community-based purpose of" .hotel.[30]

Hotel TLD's content and use restrictions are stringent and require that the domain name be used to display hotel-related content.[31]

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[23] *Id.*

[24] *Id.*

[25] Hotel TLD's Application. Answer to Question 20(a).

[26] Hotel TLD's Application. Answer to Question 20(e): Provide a description of the applicant's intended registration policies in support of the community-based purpose of the applied-for gTLD.

[27] Although it does assure ICANN and the rest of its audience of its application that it will comply with EU data protection laws. Hotel TLD's Application. Answer to Question 20(e).

[28] *Id.*

[29] Hotel TLD's Application. Answer to Question 18(b).

[30] *Id.*

[31] Hotel TLD's Application. Answer to Question 20(e).

Hotel TLD may score 1 for Content and Use.

Enforcement
To receive 1 point for Enforcement, Hotel TLD's "[p]olicies [must] include specific enforcement measures".[32]

Hotel TLD devotes *one whole paragraph* to its enforcement policies, including "standard dispute policies", a single point of contact (which is required by ICANN[33]), and random checks.[34] These are barely enforcement measures and are not at all specific.

Hotel TLD must score 0 for Enforcement.

Score
Although Hotel TLD's registration policies are clear, they do not represent the hotel industry or any kind of "community". Further, it has *no* name selection policies and or enforcement plans. Out of 4 available points, Hotel TLD can score only 1 for Criterion 3: Registration Policies.

Criterion 4: Community Endorsement; Score: 4

Summary
Out of 4 possible points for Criterion 4, the Hotel TLD merits 4.

Criteria
A maximum of 4 points is possible on the Community Endorsement criterion divided equally between Support and Opposition. For the full 2 points for Support, Hotel TLD must show that it has "documented support from, the recognized community institution(s)/member organization(s) or has otherwise documented authority to represent the community." To score 1 point for Support, Hotel TLD must show "support from at least one group with relevance, but insufficient support" to merit a score of 2. For the full 2 points for Opposition, Hotel TLD must show "no opposition of relevance". To score 1 point for Opposition, Hotel TLD must show "[r]elevant opposition from one group of non-negligible size." For 0 points, Hotel TLD may have "[r]elevant opposition from two or more groups of non-negligible size."[35]

Analysis

Support
For the full 2 points for Support, Hotel TLD must show that it has "documented support from, the recognized community institution(s)/member organization(s) or has otherwise documented authority to represent the community." To score 1 point for Support, Hotel TLD must show "support from at least one group with relevance, but insufficient support" to merit a score of 2.[36]

Hotel lists support from multiple national and international hotel associations.[37]

Hotel TLD has the requisite documentation to show sufficient support to merit 2 points.[38]

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[32] *AGB*, §4.2.3.

[33] *AGB*, §5.4.1. "registry operator must maintain and publish on its website a single point of contact"

[34] Hotel TLD's Application. Answer to Question 20(e).

[35] *Id.*

[36] *Id.*

[37] Hotel TLD's Application. Answer to Question 20(f): Attach any written endorsements from institutions/groups representative of the community identified in 20(a). Attachments available at https://gtldresult.icann.org/application-result/applicationstatus/applicationdetails/1562. Last accessed 20 February 2014.

[38] It will be shown later, however, that at least some of this so-called "support" was signed off on by groups without consulting their members, throwing into question the remaining letters of "support".

Opposition

For the full 2 points for Opposition, Hotel TLD must show "no opposition of relevance". To score 1 point for Opposition, Hotel TLD must show "[r]elevant opposition from one group of non-negligible size." For 0 points, Hotel TLD may have "[r]elevant opposition from two or more groups of non-negligible size."[39]

While there are no formal objections to Hotel TLD's application, it bears noting that the hotels and hotel associations that supported Hotel TLD's application asked ICANN's Independent Objector[40] to object to all non-Hotel TLD applications for the string .hotel.[41] After fully vetting all of the applicants, the Independent Objector, charged with safeguarding the rights of Internet users and ensuring confidence in the New gTLD Application Programme, found *no* reason to object to *any* of the .hotel gTLDs on the basis of community objections.[42]

Hotel TLD may score 2 points for Opposition.

Score

Hotel TLD scores the full 4 points for Criterion 4: Community Endorsement but it, once again, must be underscored that the Independent Objector found no reason to object to any of the other applications for .hotel—including on the basis of community support.

Conclusion

Hotel TLD's application for .hotel attempts to supersede all other applications by applying for community priority evaluation. Unfortunately, it comes nowhere near succeeding in either establishing a community, creating a nexus around that "community", or establishing registration policies to protect that community. While many in the hotel industry support Hotel TLD's application for .hotel, the supposed "community" TLD would allow numerous non-hotel entities into its namespace, including marketing agencies, accountants, law firms, and the like, and would do little to police and restrict eligibility, limit name selection, or enforce any kind of protection within its namespace.

As has been amply shown above, Hotel TLD's application for a community TLD must fail CPE. The Panel is thanked for its kind attention to this evaluation and its strict adherence to the AGB.

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[39] *AGB*, §4.2.3.

[40] See ICANNWiki entry on "Independent Objector" at http://icannwiki.com/index.php/Independent_Objector. Last accessed 20 February 2014.

[41] Public commented posted in the Application Comment section of ICANN's website. Available at: https://gtldcomment.icann.org/comments-feedback/applicationcomment/commentdetails/5719. Last accessed 20 February 2014.

[42] The Independent Objector's page at ICANN.org. Available at: http://newgtlds.icann.org/en/program-status/odr/independent. Last accessed 20 February 2014.