

April 25, 2019

ASAE, which is the largest organization in the world representing the interests of trade and professional associations, is firmly opposed to ICANN's proposal to remove price caps on the .org top-level domain (TLD) used by most associations and other tax-exempt organizations. Doing so would subject millions of associations and nonprofit organizations to what would most likely be an unstable pricing environment, forcing them to divert valuable resources from their exempt purpose in order to protect their online brand.

ASAE represents more than 44,000 association professionals and industry partners. Our members manage leading trade associations, individual membership societies and voluntary organizations across the United States and in nearly 50 countries around the world.

There are more than 10 million .org domain names registered. Legacy gTLDs like .com, .org and .net were created through the U.S. government and entrusted to ICANN to manage. ICANN then contracted with various service providers to operate legacy gTLDs – not to own them.

In its attempt to justify this current proposal, ICANN is pushing the misguided rationale that registry operators of legacy gTLDs should effectively be treated as owners entitled to whatever fees they deem appropriate even though they did not create the legacy domain names they currently manage. As ICANN reasons in its proposal, "This change will not only allow the [.org] renewal agreement to better conform with the base registry agreement, but also takes into consideration the maturation of the domain name market and the goal of treating the Registry Operator equitably with registry operators of new gTLDs utilizing the base registry agreement." It's true that registry operators that won the right to sponsor new gTLDs can charge whatever price they see fit, but they also paid millions of dollars in some cases to acquire all of the value in their sponsored domain names, whereas the service contractors managing legacy domain names most assuredly did not. This is a crucial difference that ICANN should take great care to enforce.

Stating that nonprofit organizations can easily switch from one domain name to another if they don't like the pricing structure ignores the reality that established nonprofits have a longstanding Internet presence built on a .org domain name – a name and online reputation that the organization (not the registry operator) has spent decades cultivating.

ICANN's mission is in part to preserve the operational stability of the Internet. Eliminating price caps and endangering the online credibility of the global nonprofit community is not consistent with ICANN's mission.

Sincerely,



John H. Graham IV, CAE
President and CEO