

## **Demonstration of Compliance of the Proposed Community Registration Policies with Evaluation Criteria #4 and #5 for Registry Voluntary Commitments**

The proposed Community Registration Policies for the .AVOCAT Top-Level Domain constitute a voluntary commitment by the Registry to ensure that every domain name registered in the .AVOCAT TLD remains a verifiable digital identifier of a member of the legal profession community.

These policies have been developed to satisfy Evaluation Criteria #4 and #5 applicable to Registry Voluntary Commitments (RVCs) by demonstrating that the proposed registration restrictions are necessary, proportionate, legally compliant, and fully consistent with ICANN's contractual requirements.

### **1. Compliance with Registry Voluntary Commitments Evaluation Criteria #4 and #5**

The proposed Community Registration Policies satisfy Evaluation Criteria #4 and #5 applicable to Registry Voluntary Commitments, as they are based on eligibility criteria that are:

#### **Objective and Verifiable**

Eligibility is based exclusively on membership in the **Legal Profession Community**, as defined in the **.AVOCAT Naming Charter**.

Eligibility is established through objective and verifiable evidence demonstrating that the applicant qualifies as a member of the Community, including, but not limited to:

- enrollment of an attorney on the official roll (*Tableau*) of a Bar Association;
- the existence and official registration of a law firm or other authorized legal practice entity;
- membership in, or authorization from, a recognized institution or organization representing the legal profession.

The commitments set forth in these Community Registration Policies are objectively verifiable, based on documented criteria, and are subject to ICANN compliance review based on the procedures implemented by the Registry.

## **Transparent**

All rules governing:

- eligible registrants;
- required supporting documentation;
- validation procedures;
- renewal requirements; and
- circumstances giving rise to suspension or deletion of a domain name,

are publicly available in the **.AVOCAT Naming Charter**.

## **Uniform and Non-Discriminatory**

The Community Registration Policies are applied consistently to all applicants who satisfy the applicable eligibility requirements.

They are also applied uniformly to all ICANN-accredited Registrars offering **.AVOCAT** domain name registrations. No Registrar receives preferential treatment or benefits from any exception or alternative procedure.

## **Proportionate**

The registration restrictions are limited to those strictly necessary to achieve the objectives of the **.AVOCAT** Community TLD.

Their purpose is not to restrict access to the domain name marketplace, but solely to ensure that every registrant of a **.AVOCAT** domain name is a genuine member of the Legal Profession Community.

No eligibility requirement unrelated to that objective is imposed on applicants.

## **Directly Related to the Community Purpose of the TLD**

Each **.AVOCAT** domain name must serve as a reliable digital identifier enabling Internet users to recognize an authenticated member of the legal profession or a recognized entity belonging to that Community.

Compliance with the applicable eligibility requirements is an ongoing condition of registration and must be maintained throughout the entire registration term of the domain name.

## 2. No Duplication of Applicable Law or ICANN Requirements

The proposed Community Registration Policies do not duplicate or replicate:

- French laws and regulations governing the legal profession;
- the ICANN Base Registry Agreement;
- ICANN Consensus Policies; or
- any applicable ICANN Temporary Policies.

French law establishes the requirements governing admission to and practice of the legal profession. However, it does not establish any rules governing the allocation or registration of domain names within a Top-Level Domain dedicated to that profession.

Similarly, ICANN policies establish the general obligations applicable to gTLD registries but do not prescribe the specific eligibility requirements governing access to a restricted Community namespace.

Accordingly, the **.AVOCAT** Community Registration Policies neither replace existing legal or contractual obligations nor duplicate requirements already imposed under applicable law or ICANN policies. Rather, they complement the existing regulatory framework by establishing the specific eligibility requirements necessary for the operation of a **Community gTLD** serving a regulated profession.

## 3. Compliance with Applicable Law and ICANN Policies

The proposed Community Registration Policies comply with:

- French laws and regulations governing the legal profession;
- applicable European Union law, including data protection requirements;
- the Registry Agreement entered into with ICANN; and
- all applicable ICANN Consensus Policies and Temporary Policies.

The pre-registration validation process is based solely on the collection and verification of the information necessary to confirm an applicant's eligibility.

The Registrar collects the required information and supporting documentation from the applicant and submits them to the Registry. The Registry reviews and verifies the submitted materials before the domain name is activated.

Eligibility verification is performed by the Registry in order to ensure:

- the consistent application of the eligibility criteria;

- the uniform interpretation of the **.AVOCAT Naming Charter**; and
- equal treatment of applicants regardless of the ICANN-accredited Registrar through which the application is submitted.

The personal data collected are limited to those strictly necessary to verify eligibility and are processed in accordance with applicable data protection laws and regulations.

Any decision to deny, suspend, or delete a domain name registration is supported by a statement of reasons. Registrants have access to the appeal procedures set forth in the **.AVOCAT Naming Charter**, allowing them to request reconsideration of their eligibility or to submit additional information or documentation demonstrating continued compliance with the applicable eligibility requirements.

#### **4. Compatibility with the ICANN Bylaws**

The proposed Community Registration Policies are fully consistent with the **ICANN Bylaws** and with the principles governing **Registry Voluntary Commitments (RVCs)**.

The registration restrictions are based exclusively on objective, verifiable criteria that are directly related to the purpose of the **.AVOCAT Community gTLD**.

These policies further ICANN's core objectives by:

- enhancing user trust in the Domain Name System (DNS);
- promoting the security and stability of the domain name namespace;
- reducing the risk of digital identity fraud and impersonation; and
- enabling the reliable identification of domain name registrants.

The Registry exercises no arbitrary discretion in the administration of these policies. All decisions concerning the registration, continued eligibility, suspension, or deletion of a domain name are based exclusively on the objective criteria published in the **.AVOCAT Naming Charter**.

The Community Registration Policies do not impose any general restriction on access to the Internet, nor do they pursue any objective that is inconsistent with the ICANN Bylaws or the fundamental principles governing the Domain Name System.

## 5. No Additional Registry Service Required

The proposed Community Registration Policies do not require the implementation of an **Additional Registry Service** within the meaning of the **Registry Services Evaluation Process (RSEP)**.

Eligibility verification constitutes an administrative validation process that takes place prior to the activation of a domain name registration.

This process does not affect:

- the operation of the Domain Name System (DNS);
- the Shared Registration System (SRS);
- RDDS and RDAP services; or
- the standard technical functions of a gTLD registry.

The **Registry Service Provider (RSP)** will implement the operational procedures necessary to perform the pre-registration validation of applications using the standard capabilities of the registry platform.

Accordingly, the proposed Community Registration Policies do not require the introduction of any new technical functionality or Additional Registry Service that would require a separate evaluation or approval by ICANN under the **Registry Services Evaluation Process (RSEP)**.

## Conclusion

The **.AVOCAT** Community Registration Policies are narrowly tailored to serve the purpose of the **.AVOCAT Community gTLD**.

They establish a registration framework that is:

- objective;
- transparent;
- proportionate;
- verifiable; and
- uniformly applied.

Accordingly, the proposed **.AVOCAT** Community Registration Policies satisfy **Evaluation Criteria #4 and #5** applicable to **Registry Voluntary Commitments (RVCs)**.

They constitute voluntary commitments that are necessary to preserve the integrity of the **.AVOCAT Community gTLD**, while remaining fully consistent

with applicable law, ICANN policies, and the fundamental principles governing the Domain Name System (DNS).