NEW gTLD PROGRAM: 2026 ROUND

gTLD

Independent Objectors

Information Pack

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ICANN

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1. Introduction

1.1. Overview

The New gTLD Program: 2026 Round includes an objection process, which affords certain parties an opportunity to advance arguments against identified applications for new gTLDs on different grounds. Objections also may be filed by Independent Objectors (IOs), who do not act on behalf of any particular persons or entities, but solely in the best interests of the public who use the global Internet. To mitigate possible conflict of interest issues that may arise from having a single panelist serving as the IO, there is a standing panel of three, one of whom acts as the chair.

Unless otherwise defined herein, capitalized terms used in this document have the meanings assigned to them in the New gTLD Program: 2026 Round Applicant Guidebook or, where applicable, the relevant agreement between ICANN and the Independent Objector.

Some operational portions have been redacted from the public version of this document.

1.2. Purpose Statement

The purpose of this document is to provide guidance to the IOs, outlining their roles, responsibilities, scope of work, key deliverables, timelines, and operational arrangements. The document also establishes expectations for coordination, communication, and the management of conflicts of interest, while safeguarding the independence, impartiality, and transparency of the IOs in carrying out their mandate to act in the best interests of the global Internet public.

This document is intended to complement, and does not supersede or replace, the New gTLD Program: 2026 Round Applicant Guidebook, the International Chamber of Commerce Rules relating to the 2026 Round, or the agreements between ICANN and the Independent Objectors. In the event of any inconsistency or discrepancy between this document and the Applicant Guidebook, the Applicant Guidebook shall prevail.

2. Scope of Work

2.1. Overview

IOs do not act on behalf of any particular persons or entities, but solely in the best interests of the public who use the global Internet. IOs may file objections against highly objectionable applications only on the following grounds:

- **Limited Public Interest**: Based on the claim that the applied-for string and/or one or more applied-for allocatable variant string(s) is contrary to generally accepted legal norms of morality and public order that are recognized under principles of international law.
- **Community**: Based on the claim that there is well-substantiated opposition to an applied-for string and/or one or more applied-for allocatable variant string(s)

from a significant portion of the community which the string may be explicitly or implicitly targeting.

Objections and appeals on both grounds are administered by the International Chamber of Commerce (ICC).

ICANN expects the selected IOs to demonstrate the ability to deliver on the items listed in Section 2.3 Deliverables, in line with their respective contracts, the Applicant Guidebook, and the ICC Rules.

As described in the Applicant Guidebook, the ICC will provide the IOs access to the objections filed prior to the Administrative Review to ensure they are able to review objections before the relevant deadlines. The IOs shall treat all such information as strictly confidential and shall not disclose it to any third party. Each IO will have access to all objections. ICANN will not be involved in the reviews.

The objection-filing window for those lodged by IOs will begin at the same time as all other parties, on String Confirmation Day, but will be open for seven additional days beyond the end of the objection filing window for the general public. IOs are required to file their objections only during these seven days. String Confirmation Day will be on 17 November 2026; the filing window for IOs will stay open until 24 March 2027. IOs will only file objections during the initial objection filing window. Should their objection not prevail, IOs may appeal the Panel Determination (as described in the Applicant Guidebook). IOs may also act as respondents to appeals filed by the other party and participate in mediation and settlement with affected applicants, where appropriate.

The filing of an objection or appeal does not require consensus among the IOs; However, in the case described in the section Extraordinary Circumstances, all non-conflicted IOs must agree that such extraordinary circumstances exist. One of the principal reasons for appointing three IOs is to mitigate potential conflicts of interest, and requiring consensus among them would undermine that objective, as a conflict affecting one IO could effectively prevent the others from acting.

IOs will also need to provide rationales outlining why each objection or appeal was filed, based on templates provided by ICANN. Since such rationales will be published, IOs should not include any confidential information. The IO chair will send all rationales to the Program Team within seven days of the closing of the objection filing window for IOs or within seven days of the appeal being filed. ICANN will post the rationales to the website as soon as feasible after Dispute Resolution Service Providers (DRSPs) have concluded the Administrative Review.

The IOs:

- Shall not object to an application unless at least one comment opposing the application has been made in the public sphere, in light of the public interest goal.
- Will not have their objection considered if another objection on the same ground has passed the Quick Look Review (as described in the Applicant Guidebook), absent extraordinary circumstances.
- Must consider application comments when making an independent assessment whether an objection is warranted. The IOs will have access to application comments received during the comment period.

IOs should note that the At-Large Advisory Committee (ALAC), the Advisory Committee within ICANN that represents the interests of individual Internet users per Article 12.2(d) of the ICANN Bylaws, is planning to review the submitted applications and file application comments and objections as appropriate, as described in its Procedure for Filing Comments and Objections in the New gTLD Program Next Round. Similarly as for IOs, ICANN offers funding for the ALAC to file objections and appeals to cover costs payable to DRSPs. IOs should note the Board's response to ALAC Advice from August 2024 concerning the ALAC standing for filing Community objections.

2.2. Extraordinary Circumstances

IOs will not have their objection considered if another objection on the same ground has passed the Quick Look Review, absent extraordinary circumstances. Such extraordinary circumstances include but are not limited to[1]:

- Scope
  - The IO does not believe that the scope of the objection that has already been filed is the same as their objection despite it being on the same ground.
  - The original objection is too narrow in scope.
- New elements
  - The IO has material evidence or arguments that were not raised in the original objection.
  - Material changes were proposed to the application after the original objection was filed that may raise additional concerns or not address the underlying issues.
- Bona fide
  - The IO believes the objection that has been filed is spurious despite meeting the criteria for passing the Quick Look Review.
  - The IO believes the objection may not have been filed in bona fide, e.g. with the sole purpose of preventing the IO from filing an objection against the relevant application.

If an IO believes that an application should not proceed in light of public interest concerns and an objection on the same ground for that application was already filed, they should lodge an objection nonetheless if they believe that extraordinary circumstances apply. The objection should include a detailed rationale outlining their reasoning to be part of their objection and the public rationale. In such cases, all IOs should agree that extraordinary circumstances apply, excluding those IOs that are identified as having an actual, potential, or perceived conflict of interest ("COI"). Such extraordinary circumstances will be considered by the Panel (as described in the Applicant Guidebook) as part of its assessment as to whether the IO's objection can proceed.

The DRSP will appoint the same panel to consider both objections and will perform the Quick Look Review on the objection filed by the third party.

- If the Quick Look Review fails, the Panel will consider the objection lodged by the IO.

[1] The list is not comprehensive.

- If the Quick Look Review passes, the Panel will determine whether the extraordinary circumstances described by the IO apply as part of the assessment as to whether the IO's objection can proceed.

2.3. Deliverables

2.3.1. Prior to String Confirmation Day

Expected timeframe: November 2026

- Develop, maintain, and comply with a procedural document, in coordination with the other IOs, which shall be provided to ICANN upon request. The procedural document should address:
  - Administrative and coordination procedures.
  - Communication channels and frequency among the IOs.
  - The process and applicable timelines for identifying, reporting, addressing, and mitigating conflicts of interest, including recusal and reassignment where applicable.
  - Procedures for avoiding duplicate objections among IOs.
- Complete all onboarding, training, access, conflict-review, and other preparatory activities reasonably necessary to perform IO's duties upon opening of the objection filing window.
- ***Chair only:*** Provide ICANN with a report summarizing:
  - The process used by the IOs to identify conflicts of interest.
  - Any conflicts identified.
  - For each conflict identified, the recusal, reassignment, or other mitigation measures taken.
- ***Chair only:*** Confirm the readiness of all IOs to carry out the required tasks and activities upon opening of the objection filing window.

2.3.2. Ongoing

Expected timeframe: November 2026–March 2028

- Escalate to ICANN any administrative, procedural, or operational issues that cannot be resolved among the IOs; provided that such issues do not relate to the substance of or the objections IOs choose to file.
- Ensure any requests by ICC are met within the deadlines.
- Coordinate with other IOs and participate in meetings in accordance with the procedures and frequency established in the procedural document.
- Support ICANN in addressing any accountability mechanisms described in the Applicant Guidebook for evaluation results and to supply necessary information and documentation to ICANN, as needed, on an ongoing basis.
- Review information provided by ICANN following Reveal Day to identify, disclose to ICANN, and address any actual, potential, or perceived conflicts of interest.
- Adhere to the ICANN Code of Conduct and Conflict of Interest Guidelines for Service Providers (Appendix 8 of the Applicant Guidebook).
- Adhere to ICANN Conflicts of Interest (Appendix 7 of the Applicant Guidebook).

- ***Chair Only:*** Ensure that ICANN is informed on any updates, including the number of objections and appeals that will be filed and additional costs that may be charged by the ICC. The update should not concern the content of the objections or the IOs' decisions on which objections to file.

2.3.3. During the Main Objection Filing Window

Expected timeframe: 17 November 2026–16 March 2027

- Review all New gTLD Program: 2026 Round applied-for strings, focusing on applications that may lead to Limited Public Interest and Community objections, except where IO is recused or otherwise prohibited from review due to an applicable conflict of interest.
- Monitor and analyze all comments and objections on such applications, as well as any additional input, except where IO is recused or otherwise prohibited from review due to an applicable conflict of interest.
- Maintain a record to demonstrate completion of the reviews.
- Perform research where necessary.
- Draft objections and rationales explaining the reason why each objection was filed, including, if applicable, the reason why extraordinary circumstances applied.
- Coordinate with other IOs to ensure no duplication of objections among IOs and to ensure all conflicts of interest are addressed.
- Raise any conflicts of interest issues with the other IOs and ICANN as soon as possible.
- Other administrative tasks.
- Cooperate with the IO Chair in addressing conflict-of-interest issues in a timely manner.
- ***Chair only*:** Ensure all conflict of interests issues are addressed in a timely manner in line with ICANN policies and procedures.
- ***Chair only****:* Ensure there is no duplication of objections among IOs.

2.3.4. Following the Deadline for the Public to File Objections

Expected timeframe: 17–24 March 2027

In the seven days following the deadline for the general public to file objections:

- File objections in line with ICC's and Applicant Guidebook requirements, ensuring there is no duplication.
- Document the rationale for each objection filed in line with ICANN's requirements.
- Provide the IO Chair with the list of objections filed and the rationale for each.
- **Chair only**:
    - Provide ICANN the number of objections and/or appeals that the IOs anticipate filing.
    - Provide ICANN with the list of objections that have been filed and the rationale for each within seven calendar days of the closing of the filing window for IOs for publication on the New gTLD Program website.

2.3.5. Following the Deadline for Filing Objections

Expected timeframe: March–May 2027

- Engage with the applicant and the DRSP in case of requests for a three-person panel and/or consolidation of objections.
- Provide any additional written statements and/or evidence to the DRSP/Panel as required.
- Participate in virtual hearings where required.
- Participate in mediation and settlement processes, where appropriate and in accordance with the Applicant Guidebook and ICC Rules, and provide rationales to ICANN for publication on the New gTLD Program website.

2.3.6. Following the Issuance of Panel Determinations

Expected timeframe: May 2027–April 2028

- Review each Panel Determination, should objections they have filed not prevail, and then determine, within the applicable deadline, whether to file an appeal.
- If determined to appeal, file and prosecute the appeal.
- Document the rationale for each appeal filed in line with ICANN's requirements within seven days of the filing of the appeal.
- Provide ICANN with the list of appeals that have been filed and the rationale for publication on the New gTLD Program website.
- Participate in and respond to appeal proceedings, should the other party not prevail, and elect to appeal the Panel Determination involving an objection filed by the IO.

3. Conflicts of Interest

ICANN designed guidelines to ensure that all service providers operate with integrity, impartiality, and transparency. All service providers, including IOs, must comply with COI policies of ICANN and the New gTLD Program, as described in Appendix 7 and Appendix 8 of the Applicant Guidebook.

3.1. As Part of the Contracting Process

The objective of the Contractor Conflicts of Interest Disclosure Form is to facilitate compliance with disclosure obligations described in the ICANN Conflicts of Interest Policy. The form helps ICANN to identify potential or actual COI involving business and family relationships between ICANN, its directors, liaisons, officers, employees, and contractors.

- IOs must fill in the form and send it to the ICANN Vendor Management team.
- ICANN will review the form to make sure the responses align with its existing COI policies and guidelines.
- If, during the current year, there are any material changes in the information provided in the form, IOs should promptly notify ICANN.

- IOs must agree to revise and update the form whenever circumstances require such revisions, and, at a minimum, on an annual basis.

3.2. As Soon as Contracts Are Executed

Following the execution of all three contracts, the IOs will meet to exchange information regarding their professional backgrounds and relevant interests.

3.3. As of Reveal Day

As of Reveal Day, ICANN will compile two spreadsheets including information on strings, applicants, parent entities, ultimate entities, directors, relevant shareholders, executives, and other pertinent information for all applications published on the TLD Application Management System. The reason for providing the spreadsheets is to enable IOs to identify applicants for which they may have an actual, potential, or perceived COI. If the IO identifies a COI, the affected IO will not review any applications submitted by that applicant, nor any applications that are part of a contention set with applications submitted by that applicant.

- As soon as feasible after Reveal Day, the ICANN Vendor Management team will upload the spreadsheets to a dedicated ICANN-managed shared drive and inform the IOs as soon as they are able to access the drive and obtain the two COI reports. *[redacted]*
- The IOs will review the spreadsheet and identify any COI they may have with applicants, related organizations, stakeholders, and strings. The IOs will notify the IO chair of (or take note of, in the case of the IO chair) any identified COI.
- The IO chair will compile the information in the spreadsheet and call for a meeting with the other IOs to go through the identified COI. Should any additional COI, including those involving the IO chair, be identified by the group, the spreadsheet will be updated accordingly.
- The IO chair will upload the final spreadsheet to the shared drive by String Confirmation Day at the latest.
- The IO chair will ensure that all IOs are informed of all reported COI (including any reported COI that involves the IO chair) to ensure that applications are reviewed appropriately.
    - If one of IOs is conflicted, the IO chair will ensure that another IO is assigned to handle the objections for that application and other applications that are part of a contention set with applications submitted by that applicant.
    - If a potential COI involving the chair is identified, the other IOs will ensure that another IO is assigned to handle the objections, if any.
- If a COI is identified or arises following the filing of an objection or appeal (including a COI that involves the IO chair), the IO chair may coordinate with another IO who agrees to be responsible for the impacted objection or appeal, subject to the applicable DRSP rules and procedures. The IO chair will promptly notify ICANN and the DRSP of the conflict and any resulting change.

4. Operational Arrangements

4.1. 2026 Round Key Dates

ICANN has announced the following key dates for the 2026 Round.

- **Reveal Day**: 7 October 2026
- **String Confirmation Day**: 17 November 2026
- **Community Input and Objections Period**: 17 November 2026–16 March 2027

2026 Round operations will be paused during ICANN's end-of-year office closure from 1:00 UTC on 19 December 2026 until 16:00 UTC on 4 January 2027. This pause has been factored into the Community Input and Objections Period to ensure that applicants, the community, and the public retain the full amount of allotted time to provide input or respond to objections.

4.2. Communications

IOs will use the following email addresses to communicate with ICANN:

[redacted]

Following Reveal Day, with the exception of the onboarding session, communications between the IOs and ICANN should be kept to a minimum and occur only where strictly necessary, for example in connection with the escalation of an issue. Where communication is required, written communication should be the default. Meetings should be held only where absolutely necessary and where the matter cannot reasonably be addressed in writing. Absent extraordinary circumstances, any communications relating to COI should be sent exclusively to the Vendor Management Team, and not to the Program Team. For budget planning purposes, the Program Team should receive only the information necessary to assess anticipated costs.

4.3. Financial Terms

4.3.1. Fees and Budget

The IOs' funds comprise two separate elements, both of which are funded from the proceeds of new gTLD applications:

- The **IO's fees** are fees paid to the IOs for performing their work. Providers are requested to submit a proposal for their fees using a tiered approach based on the number of applications received. ICANN will make payments to the IOs accordingly.
- The **IOs' budget** is the total amount of fees paid to the DRSP for processing objections and appeals and managing mediation. IOs will use this budget for filing objections and appeals as well as mediation fees, if applicable. The DRSP will issue invoices to ICANN, which will make payments directly to the DRSP. In extraordinary circumstances, IOs may request additional budget.

The decision to file an objection or appeal should be made independently by each IO, based solely on their assessment of the relevant application and in accordance with the IOs' mandate and scope of work, subject to the case described in the section Extraordinary Circumstances.

The chair should inform the Program Team via email, as soon as reasonably practicable, of the number of objections and/or appeals that the IOs anticipate filing. This notification should be limited to the anticipated number of filings and should not identify, or otherwise disclose, the specific applications against which the IOs intend to object or appeal. This information enables ICANN to make any necessary budgetary adjustments while preserving the independence of the IOs' assessment and decision-making process.

4.3.2. Invoicing

[redacted]

4.4. Systems

4.4.1. Application Publication and Statistics

Public information about applications is published on the Application Publication and Statistics (APS) website. It is possible to download a .csv file including such information.

4.4.2. Application Comment Forum

Application comments, which the IOs must review, will be posted to the so-called "Application Comment Forum" (ACF). The ACF will open on String Confirmation Day and remain open for the duration of the program. It can be accessed through the New gTLD Program website.

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