



GHANA DOT COM LTD

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OUR REF : GDC7/94/23

29th June, 2023

The President
ICANN
12025 Waterfront Drive, Suite 300
Los Angeles CA 90094
USA

Dear Madam

RE : CONCERN FOR THE GH DOMAIN NAME SPACE

We received a copy of letter from Honorable Minister of Communications and Digitalisation to ICANN which we are obliged to comment on.

The letter from the Hon Minister is an attempt to reject that which had been agreed to, in an MOU developed by consensus, on how the new registry will be accountable to community after re-delegation. This is the only issue outstanding.

The agreement was for Ghana Domain Name Registry (GDNR) to publish annual registration / renewal of names and remunerate ISOC Ghana chapter 10% of receipts. ISOC chapter brings a wealth of members with both technical and policy knowledge to support registry in a sustainable and stable manner.

The Hon Minister is seeking perpetual re-delegation, whilst she appears not willing to honor perpetual commitments to community with the re-delegation. This is an affront to multi stakeholder approach we practice.

The rest of content of the Minister's letter is not material and will not comment.

However, here is a bit of information on the .gh registry.

The system was in re-delegation transition to National IT Agency (NITA) and equipment bears NITA IPs as evidenced. The registry operates a 3R system with two (2) Registrars, NITA and Ghana Dot Com (GDC) during transition where NITA registers government names for free.

The Hon Minister decided to change the ongoing consensual transition to National IT Agency (NITA), to a new organization Ghana Domain Name Registry (GDNR), which does not run a network. This started a new discussion on terms of re-delegation putting at risk the ongoing delegation's deployment, in midstream.

That new discussion had also reached consensus and we are concerned that the continued back and forth is risk to operational stability of the registry. That the loose community oversight we had agreed to, is a novel legacy in governance of government operated ccTLDs and urge the Hon Minister to accept so that we can conclude the implementation of re-delegation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nii Quaynor".

NII QUAYNOR
ADMIN POC

CC:

Hon Minister, Ministry of Communications & Digitalisation
Kim Davies, Vice President of IANA
Ghana Domain Name Registry
National Information Technology Agency