
Charleston Road Registry

April 6, 2013

Christine Willett, General Manager
New gTLD Program
12025 East Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

Re: Update on Amendments to Four of Charleston Road Registry's Applications

Dear Christine Willett:

I write to update you on Charleston Road Registry's plans to amend four of our applications. As noted in Google's¹ public comment relating to the topic of closed generics dated March 7, 2013, Charleston Road Registry is in the process of amending its applications for .app, .blog, .cloud, and .search. Today, we submitted two of those amendments, for .app and .search, through ICANN's change request process. The change request forms, including redlines to the relevant sections of the applications, are attached to this correspondence. We are still involved in discussions with the relevant communities related to .blog and .cloud to develop technical standards relating to the operation of those top-level domains (TLD), but expect to submit amendments to ICANN for those applications in the near future.

To further elaborate on our plans to amend these applications, I am including a brief summary of our revised plans for each of the four TLDs below:

- .search - Our goal for .search is to provide an easily-identifiable namespace for firms that provide search functionality and to allow Internet users a unique and simple mechanism to access the search functionality of their choice. Google intends to operate a redirect service on the "dotless" .search domain (<http://search/>) that, combined with a simple technical standard will allow a consistent query interface across firms that provide search functionality, and will enable users to easily conduct searches with firms that provide the search functionality that they designate as their preference. The amendment for our .search application was recently submitted via ICANN's change request process and is attached to this letter.
- .app - We intend for .app to be a TLD dedicated to application developers. The term "app" is used in a variety of contexts, including mobile applications, browser-based applications and even desktop applications. We intend for the .app TLD to be restricted for use by relevant developer communities, but to be inclusive of the full range of application

¹ Charleston Road Registry is a wholly owned subsidiary of Google, Inc.

development communities and not to restrict registration to developers on a particular platform. Our amendment for this TLD has been submitted through ICANN's change request process and is attached to this letter.

- .blog - We have two principal goals for the .blog TLD. First, users navigating to domains within the TLD should reasonably expect to reach a blog when they access a .blog domain name. Second, it should be simple and easy for .blog registrants to associate their second-level domain with their blog on the blogging platform of their choice. To this end, we are working with others in the blogging community to develop a simple set of technical standards that will allow users to automatically link their domain name to their blog at the time of registration. Registrations within the TLD will be limited to those with blogs adhering to these technical standard. We expect to submit an amendment to our application for .blog by the end of the month.
- .cloud - As with .blog, our goal for .cloud is to create a clear association between .cloud names and projects hosted in cloud platforms, while simultaneously allowing registrants to more easily link domain names with the cloud offering of their choice. We are in the earlier stages of discussions with others in the cloud community, but intend to develop similar technical standards as with .blog. We expect to submit an amendment to our application for .cloud in the near future.

We believe that each of these TLDs offers a powerful and innovative experience for Internet users and domain registrants, in several cases unlike those currently offered by any TLD operator or proposed by other applicants. We are excited to continue to participate in the new gTLD program and work with those throughout the community to continue to improve our gTLD offerings.

Sincerely,



Enclosure

cc:

Andrew Maurer, Australian GAC Representative
Peter Nettlefold, Australian GAC Representative
Heather Dryden, Chair of the GAC
Suzanne Radell, US GAC Representative
Cyrus Namazi, Vice President, DNS Industry Engagement



New gTLD Application Change Request Form

Application ID:	1-1138-86970
Applying Entity:	Charleston Road Registry
Applied-for TLD:	APP
Primary Contact Name:	Sarah Falvey
Primary Contact Email:	tas-contact3@google.com; sarahfalvey@google.com
Primary Contact Phone No:	1 202 346 1230
Reason for the change request, including the relevant Question number:	<p>We have developed a stronger and more inclusive registration model for the TLD that allows registrations by a wide range of application developers. The proposed registration policy does not limit potential registrants to a particular type of application development or any specific platform. We believe that the revised registration model will provide more opportunities for potential registrants and an improved TLD for the entire internet community, including potential end users interested in navigating to .app domain names.</p> <p>The proposed change affects Questions 18, 28 and 29.</p>

Additional Information Required

Please also provide a redlined document of the changes that you are requesting. Please be sure to include the question number(s) for the requested change(s). The redlined document should contain:

- The answer(s) exactly as entered in TAS
- Changes that you would like to make to these answers in tracked changed

18(a). Describe the mission/purpose of your proposed gTLD.

18.a. Mission/Purpose of the Proposed gTLD

Charleston Road Registry is an American company, wholly owned by Google, which was established to

provide registry services to the Internet public. Google is an American multinational public corporation and global technology leader focused on improving the ways its hundreds of millions of users connect with information. Since its formation, Google has been developing technology that can improve upon existing ways of doing business on the Internet. Google provides a variety of services and tools for Internet users and advertisers of all sizes, from simple search features and local ads to enterprise-scale business applications and global advertising solutions. These tools make it easier for people to make use of the world's information and enable entrepreneurs and publishers around the world to grow their businesses.

In line with Google's general mission, Charleston Road Registry's mission is to help make information universally accessible and useful by extending the utility of the DNS while enhancing the performance, security, and stability of the Internet for users worldwide. Charleston Road Registry aspires to create unique web spaces where users can learn about Google products, services and information in a targeted manner and in ways never before seen on the Internet. Its business objective is to manage Google's gTLD portfolio and Google's registry operator business. As discussed further in the responses to questions 23 and 31, Charleston Road Registry intends to outsource all critical registry functions to Google Registry Services.

~~The proposed gTLD will provide Google with direct association to the term "app," which is an abbreviation of "application."~~ The mission of ~~this~~ the proposed gTLD, .app, is to provide a dedicated domain space ~~in which Google and select members of its application developer network ("Network") can enact second-level domains that relate to the offering of Google's and its Network's applications and application-specific content for application developers.~~ The term "app" is associated with a wide variety of applications, including mobile applications, web- and browser-based applications, cloud-hosted applications and even desktop applications. Charleston Road Registry expects uses of the gTLD ~~may will include a wide variety of but are not limited to Chrome applications, web applications, Google App Engine applications, Android applications, and mobile applications on other platforms uses across all of these types of applications, not limited to any specific platform or provider.~~ The proposed gTLD will enhance consumer choice by providing new availability in the second-level domain space in which application developers ~~Google and its Network~~ can deliver new content and offerings. It also creates new layers of organization on the Internet and signals the kind of content available in the domain.

18(b). How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

18.b. Benefits to Registrants, Internet Users, and Others

18.b.i.1. Specialty

~~Charleston Road Registry intends to operate the proposed gTLD as a closed registry with Google as the sole registrar and registrant.~~ The goal of the proposed gTLD is to allow ~~Google and its Network~~ application developers to manage the domain name space for their application offerings. The proposed gTLD will provide ~~Google and its Network~~ application developers with the ability to customize domain and website name application offerings to signal to the general population of Internet users that .app websites are indeed ~~managed by Google~~ related to applications and application developers. ~~The specialization goal of the proposed gTLD is to extend the Google brand and reputation to each app second-level domain.~~ This specialized domain name space provides a mechanism by which ~~Google and its Network~~ application developers can easily link and manage their applications and related services. This specialization makes it clear to Internet users that this is the authoritative and designated space where they can find ~~Google's and its Network's~~ applications and

~~information about developers offered in association with the Google brand and~~ accessible via differentiated and streamlined web addresses.

18.b.i.2. Service Levels

Through its association with Google, Charleston Road Registry is uniquely positioned to enable and support the proposed gTLD by providing its service reliability and speed of delivery as a part of its services. Google brings unique expertise and a proven record of excellence in infrastructure operations: Google now runs the largest DNS system in the world, has industry-leading uptime on its services, such as web search, and offers enterprise services on which governments and businesses depend.

Charleston Road Registry's service level goal for the proposed gTLD is to ensure that, ~~Google, as the sole~~ registrars and registrants, ~~is are~~ supported in delivering the high level of quality, speed, and service to users for which ~~#Google~~ is known. Indeed, two of Google's core principles in providing Internet search and related goods and services are "focus on the user and all else will follow" and "fast is better than slow."

In focusing on the user, Google strives to provide the best user experience possible. Google will continue to operate under this principle when designing new offerings and providing goods and services within the proposed gTLD.

Google keeps speed in mind with each new product it releases, from faster mobile applications to improved Web browsers designed for rapid search and navigation. Google continues to devote its resources to improving speed and efficiency. In managing the proposed gTLD, Google expects to keep its service reliability and speed to this standard through direct management of all technical infrastructure related to DNS resolution other than the operation of the root servers.

Charleston Road Registry is committed to using the most technologically advanced, secure, and reliable registry and registrar services for all of the domain names within the gTLD so as to not compromise the service levels, security, and stability of the gTLD to users across the globe.

18.b.i.3. Reputation

Google has a proven record of providing high-quality, secure online services. Charleston Road Registry seeks to enhance Google's reputation for excellence, superior quality, and high level of security and to become known as an exemplary domain name services provider.

When Internet users visit a domain name in the proposed gTLD, they will be able to reliably expect and experience the high level of security and quality on which Google's reputation has been built.

The registry will be structured ~~so in such a way~~ that Charleston Road Registry ~~registers and manages domain names in the gTLD for Google's and its Network's application offerings, that those domain names are used for only Google's and its Network's application purposes, will enable registrars to register and oversee second-level domain names in the proposed gTLD; that registrars develop and deploy a reasonable process for ensuring that those domain names are used for gTLD-relevant purposes as specified in the registry-registrar agreement; that the WHOIS is thick and reliable;~~ and that the registry is responsive to legal rights owners (if applicable).

~~In addition, Charleston Road Registry intends to apply for an exemption to ICANN's Registry Operator~~

~~Code of Conduct and operate the proposed gTLD with Google as the sole registrar and registrant. This facilitates Google's ability to further enhance the reputation of its trademarked brand.~~

Charleston Road Registry plans to develop and publish eligibility criteria for all registrants in the proposed gTLD and will work with its registrars to execute the eligibility verification process. This process will imbue additional meaning to all second-level domains in the gTLD and enhance the gTLD's reputation by establishing an authoritative community of content providers. When Internet users visit a website in the proposed gTLD environment, they will be able to reliably expect content relevant to the proposed gTLD.

In addition, Charleston Road Registry's operation of the new gTLD will provide the opportunity for registrars and registrants to build and/or bolster their unique brands and brand reputation in association with the proposed gTLD.

18.b.ii.1. Competition

Charleston Road Registry supports the advancement of registry operators as a whole and the diffusion of gTLDs amongst diverse stakeholders to generate increased competition for the benefit of the Internet public. Increased competition will result in more competitive prices for consumers, additional efficiencies and increased productivity in enterprises, and spur innovation in the gTLD space.

Google will have the opportunity to differentiate and innovate upon its Google application offerings through its use of the .app gTLD. The proposed gTLD will provide a new mechanism whereby Google and its Network can offer applications and related products and services. As a new distribution channel for applications, the .app gTLD will help grow the volume of applications on the Internet, thereby increasing competition among all application developers and providers.

The proposed gTLD, .app, will provide a new online structure for the aggregation of content related to applications and application developers. As an alternative to existing second-level domains, Charleston Road Registry anticipates that the .app gTLD will increase competition among registrars by allowing for further product and pricing differentiation opportunities when offering second-level domains in the gTLD. Charleston Road Registry expects that the .app gTLD will lower barriers to entry for registrants and foster growth in the number of entities offering content related to applications on the Internet, thereby increasing competition among application developers. Charleston Road Registry also anticipates the .app gTLD may contribute to an increase in online advertising given the specific nature of the domain. Entities will compete to advertise their goods and services and reach a targeted audience of application developers and/or users interested in content related to applications.

Managing this namespace will allow Charleston Road Registry to provide to registrars and registrants the high level of technical operations quality and service for which Google is known, which in turn will incent other existing and new gTLDs to improve the quality of their offerings.

Charleston Road Registry will facilitate a fair and equitable registrar process, providing open access to any registrar who meets ICANN accreditation guidelines and fully complying with the Registry Operator Code of Conduct. Charleston Road Registry is committed to treating all registrars equitably and will not offer preferential treatment to Google in its capacity as registrar.

~~The proposed gTLD will promote competition in the gTLD space by inciting other application providers to respond with greater range and higher quality products and services integrated with domain name offerings, and/or the creation of their own respective gTLDs, to the benefit of all Internet~~

~~users. Launching the proposed gTLD will also generate increased competition in the online marketplace by adding incremental availability to the second-level domain pool.~~

~~Charleston Road Registry intends to apply for an exemption to the ICANN Registry Operator Code of Conduct and to act as the sole registrar for the proposed gTLD. Given that the proposed gTLD is exclusively intended for use in connection with Google provision of Google applications offerings, Charleston Road Registry believes that there is a reasonable case for such an exemption. Should ICANN not approve this proposed exemption, Charleston Road Registry will facilitate a fair and equitable registrar process, providing open access to any registrar who meets ICANN accreditation guidelines.~~

18.b.ii.2. Differentiation

~~The proposed gTLD will clearly be differentiated from other gTLDs due to its purposefully limited scope. This differentiation includes: (1) uniqueness in terms of the users the proposed gTLD seeks to benefit; (2) a clear indicator that second-level domains within the gTLD offer a particular, targeted content; (3) and that Google and Charleston Road Registry's affiliates will be able to affix Google's well-known brand to second-level domains, and as a result Internet users will immediately know the source of the gTLD. provide the marketplace with an authoritative space for registrants to deliver content, imparting brand differentiation not currently available in the current gTLD space. It also delivers value to the Internet public by defining the meaning of the gTLD term, providing for the verification of registrants who will offer content in the proposed gTLD environment, and encouraging a specific use. These activities differentiate the proposed gTLD space in a new and meaningful way.~~

~~The gTLD will provide an authoritative environment for the exclusive provision of the range of Google application offerings. New, higher quality products offered in the gTLD will also attract new users to Google applications.~~

~~The .app gTLD provides Google and its Network application developers with the opportunity to differentiate their online content by linking all of their application offerings to a unique, umbrella, Google-managed gTLD. Google will be able to quickly distinguish the new applications it develops and/or acquires by offering them in the proposed gTLD. The signification of an application-related TLD is not currently available in the gTLD space.~~

~~In addition, given its association with Google, Charleston Road Registry offers a unique value proposition to registrars and registrants resulting from the strength of Google's trusted brand, technical leadership, and support for free speech on the Internet. Registrars will have the opportunity to leverage this brand in devising their own market positions.~~

~~The gTLD will also allow Google to more securely work in communities where access to dependable and safe online services are limited or fragmented and provides the opportunity to reach a broader cross-section of current and potential global Internet users.~~

18.b.ii.3. Innovation

Through innovation and iteration, Google consistently aims to improve upon technologies that connect people with information. One of its core principles is "great isn't good enough." One example of this belief in action is Google's introduction of Gmail storage capacity far exceeding other email service providers' capacity limits at the time, which eventually led to substantially improved offerings from a

wide range of providers. Google is committed to anticipating needs not yet articulated by its global audience, and meeting them with products and services that set new standards.

~~The proposed gTLD will foster innovation by creating a new space for the categorization and classification of online content. It will therein provide a mechanism by which registrars and registrants can better brand and manage their online presence by associating it with the .app namespace. This namespace delivers value to the public through the provision of new and differentiated content, goods, and services to Internet users. The proposed gTLD will spur further innovation at Google by providing an accelerated platform for the introduction of new offerings to the public. The proposed gTLD will provide a mechanism for enhanced branding and management of Google applications.~~

~~The proposed gTLD, .app, will promote innovation by encouraging Google and its Network to create new applications for distribution in the .app gTLD. In addition, the proposed gTLD will encourage other application developers to create new applications and/or provide linkages to their respective applications that fulfill the same need as .app will provide with its offerings. In addition, Google may choose to innovate within its portfolio of web spaces and introduce distinguishing feature(s) that further crystallize the relationship between applications offered in the gTLD and the Google brand and reputation. This will likely invite user comparison among domain sites, encouraging application-developer competitors to innovate new features and services as a point of differentiation.~~

~~The proposed gTLD, .app, will promote innovation among registrars by opening the possibility for application developers to own second-level domains in which they can deliver content related to their businesses and their applications to the Internet public. This provides registrars with the opportunity to create and offer tailored new products and services that benefit registrants and/or improve user experience in association with the registration of a second-level domain in the .app gTLD. The proposed gTLD aspires to become an authoritative online resource for application developers and those seeking information about applications. In addition, broad use of the .app gTLD will likely invite user comparison among second-level domain sites. This will encourage second-level domain registrants to innovate and improve upon their content and/or offerings as a point of differentiation.~~

Charleston Road Registry considers the proposed gTLD to be a platform for innovation with existing and future Google products and services. Charleston Road Registry, therefore, may incorporate these new offerings into future registry service options (subject to the ICANN approval process), infusing new ideas into the gTLD for the betterment of the public.

Google consistently aims to improve upon technologies that connect people with information, as demonstrated by a proven record of innovation and iteration. Charleston Road Registry strives to offer its users this same level of continuous development in advancing its management and operation of the gTLD, engendering an improved user experience engendering benefits to registrars, registrants, and end users.

18.b.iii. User Experience

Charleston Road Registry will strive to provide the highest level of user experience through operational stability, security and performance to serve the interest of registrants in the proposed gTLD. Charleston Road Registry is uniquely positioned to provide this level of experience given its relationship with Google; Google invested over \$3 billion in its IT infrastructure in 2011 and maintains a record of excellence in infrastructure operations.

Charleston Road Registry and Google, as the registry operator and registrant respectively, will take great care to ensure that users' needs are served. Google anticipates that the proposed gTLD will provide its users around the globe with Google application offerings in a more stable, secure, and expedient manner than ever before.

~~The proposed gTLD, furthermore, facilitates an improved online user experience by provisioning the DNS on application providers' behalf and streamlining the process by which providers are able to link to and make use of the Google gTLD. will provide registrants with the opportunity to differentiate their dedicated domain space such that the end users are able to discern the type of content intended to be found within the proposed gTLD. This will enable increased user visibility of registrants' offerings, as well as provide registrants with the opportunity to enhance their respective content offerings and innovate in new ways.~~

~~The proposed gTLD will provide a more trusted and user-friendly environment where domain names and content related to the .app gTLD can flourish. Charleston Road Registry seeks to have users deem the gTLD trustworthy and reliable and recognize it as an aggregated source of targeted goods, services, and information.~~

~~The proposed gTLD, .app, will provide users with an improved Google application experience by allowing for its Network's direct management of their offerings within the .app gTLD.~~

~~In focusing on the user, Google strives to provide the best user experience possible. Google will continue to operate under this principle when designing and providing new service offerings in the proposed gTLD. The proposed gTLD will provide users with improved customization services and facilitate additional opportunities to enhance their current and future experience with Google applications.~~

~~The proposed gTLD will provide a more trusted and user-friendly environment where domain names and content related to the .app gTLD can flourish. Charleston Road Registry seeks to have users deem the gTLD trustworthy and reliable and recognize it as an aggregated source of Google and Network application offerings.~~

The proposed gTLD, furthermore, facilitates an improved online user experience through greater structure and categorization on the Internet.

18.b.iv. Registration Policies

~~Charleston Road Registry believes that given its specific use related to Google applications, the .app gTLD will best add value to the gTLD space by limiting all second-level domains to the sole use of pointing to select Google and Network applications and application-related content. Google, as the sole registrant, will manage the second-level domain eligibility and allocation process. In addition, only application developers who meet certain criteria will be eligible for a second-level domain name within the .app gTLD.~~

~~Because the sole purpose of the proposed gTLD is to associate domain names with Google applications, Charleston Road Registry intends to apply for an exemption to the ICANN Registry Operator Code of Conduct and operate the gTLD with Google as the sole registrar and registrant. As the sole registrant, Google will have the opportunity to differentiate and innovate upon Google~~

~~application products and services through its use of the gTLD.~~

~~Given the proposed limited scope and use of the gTLD, Charleston Road Registry believes that there is a reasonable case for such an exemption. Should ICANN not condone this proposed exemption, Charleston Road Registry will make access to Registry Services, including the shared registration system, available to all ICANN-accredited registrars.~~

Charleston Road Registry is committed to implementing strong and integrated intellectual property rights protection mechanisms. Doing so is critical to Google's goals of model Internet citizenship and fostering Internet development, especially in emerging regions. Accordingly, Charleston Road Registry intends to offer a suite of rights protection measures which builds upon ICANN's required policies while fulfilling its commitment to encouraging innovation, competition and choice on the Internet.

Charleston Road Registry reserves the right to impose registrant verification enforcement policies on registrars.

Charleston Road Registry believes that the .app gTLD will best add value to the gTLD space by limiting registration to only application developers. Charleston Road Registry plans to require registrars to confirm that a domain applicant is an application developer via an established process. If the domain applicant passes the eligibility verification process, only then will the applicant be eligible to apply for a second-level domain in the .app gTLD. To preserve the integrity of the gTLD, Charleston Road Registry reserves the right to adopt certain monitoring measures, including periodic audits. Charleston Road Registry also reserves the right to adopt enforcement measures, including a request that registrars facilitate a user reporting method to log complaints and/or potential instances of misuse within the gTLD. If a registrant is found to be in violation of the terms of the registry-registrar agreement or the registrar-registrant agreement, Charleston Road Registry may request that the appropriate registrar enforce such agreements through penalties, including but not limited to suspension of the domain name.

18.b.v. Protection of Privacy and Confidential Information

Charleston Road Registry will strive to ensure the appropriate level of privacy and security will be met for its users. Although Google will be the only registrant (and is intended to serve as the only registrar for the gTLD as well), Charleston Road Registry and its provider of registry services, Google, have imposed measures to achieve this protection for their users; additional specifics regarding the practices for the registry include but are not limited to the following:

~~-Since Google will be the only registrant, personally identifying information regarding individual users will not be sent to or stored by the registry. Such data will remain on Google's infrastructure used to provide the individual service, and is subject to Google's existing privacy policy.~~

-All data transmitted from registrars to the registry will be encrypted using TLS or other similar data protection schemes to ensure that third parties cannot access personally identifying information or other sensitive data as it crosses the Internet.

- Charleston Road Registry will attempt to prevent the misuse of WHOIS data for improper purposes such as spam, intellectual property theft or phishing. Charleston Road Registry will attempt to identify patterns of abusive usage of the WHOIS service and will appropriately use CAPTCHA, query throttling or other techniques to prevent information scraping.

- Google will restrict access to data and information systems maintained by the registry to a specific list of individuals involved with supporting the Google Registry system in production. Google will review this list on a periodic basis to ensure that the level of access granted to individuals is appropriate. Google uses two-factor authentication and other mechanisms to ensure that staff with access to user information are properly identified prior to using registry systems.

- Google data backups stored offsite are encrypted with passwords that are securely managed on Google's internal systems. Google can effectively remove the ability to access this data by destroying the relevant encryption password.

- Supplying Google account information will be optional for registrants unless the domain registration is directly associated with another Google product offering. Google will not disclose Google account information except for any contact information provided by the user that is required by ICANN to be displayed in response to a WHOIS query.

~~- RIn the event that other registrars are involved,~~ registrar billing and payment information will not be stored alongside domain name registration information. All registrar billing and payment information will be stored in a PCI-compliant billing system similar to that used by Google Ads.

- Data will not be shared with third parties without permission of registrants, except as required for registry operations or as required under the law, such as in response to a subpoena, other such court order, or demonstrated official need by law enforcement.

Beyond these specific mechanisms, both Charleston Road Registry and Google will govern its approach to privacy by the Google Privacy Policy. This policy applies to registrars, registrants and end users of registry services such as DNS zone publication and WHOIS data publication. The Privacy Policy is located at <http://www.google.com/policies/privacy/>.

18.b.vi. Outreach and Communications Efforts

Once Charleston Road Registry begins developing public-facing resources in its gTLD, it intends to inform the public about the gTLD and the ~~Google-related information, goods, and services available there. Outreach and communication efforts will focus on promoting the fact that all domain names and websites on the proposed gTLD will be operated and backed by Google. Google, as the sole registrar and registrant, will have the opportunity to further advertise and promote this new brand presence to raise user awareness and increase usage of sites in the new gTLD: opportunity to obtain domain space there through investments in marketing and public relations.~~

Charleston Road Registry intends to promote gTLDs in its portfolio collectively, such that the public gains an awareness and understanding of new gTLDs and the availability of new second-level domain space on the Internet. Charleston Road Registry believes that this approach will make the strongest impact in modifying consumer behavior and is the best path to achieving success for all new gTLDs collectively.

Charleston Road Registry will reach out to the Internet community via a number of different outreach and communications methods and venues to deliver its mission and message to the public, including but not limited to: press briefings, videos posted on various Internet sites, blogs and other social media,

and paid advertising. In addition, when developing resources for localized Internet registrars in different global regions, Charleston Road Registry will use local marketing and communications platforms as needed.

18(c). What operating rules will you adopt to eliminate or minimize social costs?

18.c. Minimizing Social Costs and Other Negative Consequences

18.c.i

~~Should ICANN grant Charleston Road Registry's exemption to the Code of Conduct, and the proposed gTLD operate with Google as the sole registrar and registrant, members of the public will not be able to directly register domain names in this new gTLD. Members of the Network will, however, be given the opportunity to make use of a vanity second-level domain as a memorable identifier linked to their application offerings in the .app gTLD. Network members will be assigned a vanity domain name pursuant to Google's forthcoming eligibility guidelines.~~

Members of the public will need to meet stated registration policy criteria to register domain names in the proposed gTLD.

Registration will be managed by Charleston Road Registry in three phases.

Phase 1 - The first phase will be an extended 60-day sunrise phase. Only owners of trademarks listed in the Trademark Clearinghouse may participate in this phase, and such owners may register domain names that consist of an identical match to their listed trademarks. At the end of the sunrise phase, at a minimum, In addition, GoogleCharleston Road Registry will follow ICANN rules for attributions of trademarked second-level domains and will offer other protections for trademark owners, including but not limited to an extended Trademark Claims Service of indefinite length.

18.c.ii

While Charleston Road Registry reserves the right to charge different prices for unique second-level domains within the gTLD, once Charleston Road Registry determines the price for a particular second-level domain, Charleston Road Registry will not price discriminate among ICANN-accredited registrars. Charleston Road Registry does not intend but reserves the right to offer introductory discounts and bulk registration discounts. Volume discounts, marketing support and incentive programs may be made available, and if so will be offered to all ICANN-accredited registrars without preference.~~Should ICANN grant Charleston Road Registry's exemption to the Code of Conduct, the proposed gTLD will operate with Google as the sole registrar and registrant. As registrations will be granted based on Google business needs and user demand, Charleston Road Registry will charge prices commensurate with overall business costs. Charleston Road Registry does not intend but reserves the right to offer introductory discounts and bulk registration discounts to this sole registrant.~~

18.c.iii

Pursuant to the ICANN-Registry Operator Agreement, Charleston Road Registry will provide written notice a minimum of 30 days prior to any increases in price for initial registrations, as well as written notice 180 days prior to any increase in registration renewals. Further, Charleston Road Registry will offer uniform pricing for renewals as specified in the ICANN-Registry Operator Agreement.

Charleston Road Registry does not currently intend to make contractual commitments to registrants regarding the magnitude of price escalation. Charleston Road Registry does, however, intend to keep its

~~practices competitive and aligned to activity in the marketplace. Should ICANN grant Charleston Road Registry's exemption to the Code of Conduct, the proposed gTLD operate with Google as the sole registrar and registrant. As registrations will be granted based on Google business needs and user demand, Charleston Road Registry will charge prices commensurate with overall business costs. Contractual commitments to registrants regarding price escalation are not relevant to Google's mission or goals for the new gTLD at this time, as Google is the sole registrant.~~

28. Abuse Prevention and Mitigation

~~It is anticipated that only Google and its affiliates will be eligible to register domain names within the top-level domain (TLD). At no time during the life of the registry does Charleston Road Registry (CRR) plan to offer domain name registrations to third parties, and CRR will employ a stringent verification process to establish that every prospective registrant meets the registration criteria. In addition to this verification process, we will implement strict policies and procedures to minimize abusive domain name registrations and uses and other activities that have a negative impact on Internet users.~~

~~Specifically, w~~We will implement in our internal policies and in our Registry/Registrar and Registration Agreements that all registered domain names will be subject to a Domain Name Anti-Abuse Policy ("Abuse Policy"). The Abuse Policy will provide CRR with broad power to suspend, cancel, or transfer domain names that violate the Abuse Policy. We plan to post the Abuse Policy on a publicly facing website at nic.search/abuse, which will provide a reporting mechanism whereby violations of the policy can be reported by those who are impacted; an easy to find place to report policy violations; "plain language" definitions of what constitutes a "reportable" problem; and compliance processes to provide due process, and sanctions that will be applied, in the case of policy violations. The nic.search/abuse website will list CRR's Abuse Point of Contact. The Abuse Point of Contact shall consist of, at a minimum, a valid e-mail address dedicated solely to the handling of abuse complaints. CRR will ensure that this information is kept accurate and up to date and will be provided to ICANN if and when changes are made. The Abuse Point of Contact will review complaints regarding an alleged violation of the Abuse Policy.

28.1. Abuse Tracking

CRR also plans to catalog all abuse communications in Google's customer relationship management (CRM) software using a ticketing system and to maintain records of all abuse complaints for an appropriate amount of time. We shall only provide access to these records to third parties under limited circumstances, such as in response to a subpoena or other such court order or demonstrated official need by law enforcement.

The Abuse Policy will define abuse as an action that:

- a. Causes actual and substantial harm, or is a material predicate of such harm; and
- b. Is illegal or illegitimate, or is otherwise considered contrary to the intention and design of a stated legitimate purpose, if such purpose is disclosed.

~~We further anticipate that the Abuse Policy will state that only Google and its authorized affiliates are authorized to register and operate domain names within the TLD, and that it~~Charleston Road Registry and accredited registrars conducts an ongoing verification process designed to establish that a prospective registrant meets the registration criteria, namely that the registration ~~was made by Google or an authorized affiliate~~complies with the technical standards described in Question 18.b.iv.

28.2. Abuse Definitions

The Abuse Policy will also name and provide basic definitions as to what constitutes the abusive registration and/or use of domain names within the TLD. These will include, but not be limited to, the following activities:

1. Unqualified Applicant - not authorized to register domain name;

2. Child Pornography - Web sites that contain content that exploits children, such as child pornography (including cartoon child porn) or content that presents children in a sexual manner;
3. Fake renewal notices - Fake renewal notices are misleading correspondence sent to registrants from an individual or organization claiming to be or to represent the current registrar. These are sent for a variety of deceptive purposes, such as obtaining an unnecessary fee (fraud); getting a registrant to switch registrars unnecessarily (“slamming”, or illegitimate market-based switching); or to obtain registrant credentials or authorization codes to facilitate theft of the domain;
4. Cross-TLD Registration Scam - a deceptive sales practice where an existing registrant is sent a notice that another party is interested in or is attempting to register the registrant’s domain string in another TLD;
5. Domain kiting/tasting - Registrants may abuse an Add Grace Period through continual registration and deletion of domain names to test their monetization (“tasting”), and re-registration of the same names in order to avoid paying the registration fees (“kiting”);
6. Phishing - a Web site fraudulently presenting itself as a trusted site (often a bank) in order to deceive Internet users into divulging sensitive information (e.g. online banking credentials, email passwords);
7. Spam - use of electronic messaging systems from email addresses from domains in the TLD to send unsolicited bulk e-mail;
8. Malware/Botnet Command-and-Control - Malware authors sometimes use domain names as a way to control and update botnets. Botnets are composed of thousands to millions of infected computers under the common control of a criminal. Botnets can be used to perpetrate many kinds of malicious activity, including distributed denial-of-service attacks (DDoS), spam, and fast-flux hosting of phishing sites;
9. Use of Stolen Credentials –such as stolen credit card numbers, to register domain names for malicious purposes;
10. Pharming - redirecting of unknowing users to fraudulent Web sites or services, typically through domain name system (DNS) hijacking or poisoning;
11. Fast flux hosting - use of fast-flux techniques to disguise the location of Web sites or other Internet services, or to avoid detection and mitigation efforts, or to host illegal activities. Fast-flux techniques use DNS to frequently change the location on the Internet to which the domain name of an Internet host or name server resolves. Fast flux hosting may be used only with prior permission of CRR;

28.3. Abuse Policy Rights Reserved

The Abuse Policy will state, at a minimum, that CRR reserves the right to deny, cancel, or transfer any registration or transaction, or place any domain name(s) on registry lock, hold, or similar status, that it deems necessary, in its discretion: (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of CRR, as well as its affiliates, subsidiaries, officers, directors, and employees; (4) per the terms of the registration agreement or any agreement CRR has with any party; (5) to correct mistakes made by CRR, its registry services provider, or any registrar in connection with a domain name registration; (6) during resolution of any dispute regarding the domain; and (7) to remedy the abusive registration or use of any domain name.

28.4. Orphan Glue

~~For closed registries, there is unlikely to be orphan glue. Nonetheless, the following policy will apply to the TLD.~~ We will remove orphan glue records for names removed from the zone when provided with evidence in written form to the Abuse Point of Contact that the glue is present in connection with malicious conduct according to Specification 6 of the New gTLD Registry Agreement. Google’s back-end systems will also periodically search for orphaned glue. We will inform its registrants that it removes glue if the covering zone is removed, and thus registrants should not reference it from outside the domain.

28.5. Resourcing

CRR and its affiliates will commit ample resources for the purpose of implementing its internal policies and its Registry/Registrar and Registration Agreements. As described herein, we will create an Internal Abuse Team, including an Abuse Point of Contact, whose responsibilities will include reviewing, responding, cataloging, and, if applicable, remedying complaints regarding alleged violations of the Abuse Policy. This team will be dedicated to manually reviewing abuse complaints. The roles and responsibilities of the team members are anticipated to include, but are not limited to, the following:

- Reviewing, responding, and if applicable, resolving complaints regarding alleged violations of the Abuse Policy
- Enforcing the Abuse Policy
- Monitoring productivity and efficiency of the manual review process
- Addressing high priority escalations from Law Enforcement quickly
- Collaborating with internal and external partners to drive issues to resolution
- Interface with the technical team to improve workflow, prioritize escalations, create tools for the manual review process

28.6. Anti-abuse Notice and Takedown Procedure

In order to reduce abusive registrations that affect the security of the TLD and its users, CRR plans to provide a domain anti-abuse notice and takedown procedure. Specifically, we will operate an anti-abuse website at the URI address nic.search/abuse that will provide the contact information for the Abuse Point of Contact. The nic.search/abuse website will prominently display CRR's Abuse Policy and a fill-in section wherein the user will then be asked to fill in several fields, including the user's identity and contact information, and the identity and relevant information of the individual or organization that is making an abusive registration or use of a domain name within the TLD, and specific details on how, why, and when the complainant believes the registration or use of the domain name is abusive. The user will be asked to read the Abuse Policy before it submits a complaint and then click on a check box to indicate that the user has read and understands the Abuse Policy.

28.7. Abuse Response

CRR will then provide a targeted response time as to the decision regarding the complaint. We will review with the Internal Abuse Team and render a decision regarding the alleged abuse, and decide whether to deny, cancel, or transfer any registration or transaction, or place any domain(s) on registry lock, hold, or similar status that violates the Abuse Policy, if applicable. In accordance with the applicable terms of service, CRR reserves the right to terminate the accounts or domains of repeat abusers.

Specifically, the process is anticipated to occur as follows: an email containing the information relayed in the complaint will be sent to the Abuse Point of Contact. The Abuse Point of Contact will send an email to the complainant within twenty-four hours of receiving the complaint confirming receipt of the email. The Abuse Point of Contact will preliminarily review to determine whether the complaint reasonably falls within an abusive use as defined by the Abuse Policy. If the complaint does not, the Abuse Point of Contact will email the complainant within forty-eight business hours of the confirmation email to indicate that the subject of the complaint does not fall within the abusive uses as defined by the Abuse Policy, and that CRR considers the matter closed.

If the preliminary review does not resolve the matter, the Abuse Point of Contact will relay the complaint to CRR's Abuse Team.

All requests from law enforcement will be flagged for prompt review by the Internal Abuse Team.

With the resources of Google's registry services team, CRR can meet its obligations under Section 2.8 of the Registry Agreement where required to take reasonable steps to investigate and respond to reports from law enforcement and governmental and quasi-governmental agencies of illegal conduct in connection with the use of its TLD.

In high-priority cases the Internal Abuse Team will seek to determine within forty-eight business hours

whether the registration or use of the domain within the TLD is abusive as defined by the Abuse Policy. In all cases, the Internal Abuse Team will determine whether a domain is abusive within seven business days or sooner of receipt of the Complaint. If an abusive use is determined, the Internal Abuse Team may alert the registry services team to immediately suspend resolution of the domain name, as appropriate. Thereafter, if we decide to suspend resolution of the domain name at issue, the Abuse Point of Contact will immediately notify the abusive domain name registrant of such action, the nature of the complaint, and provide the registrant with the option to respond within ten days. All such actions will be ticketed in Google's CRM software to maintain accurate complaint processing records. If the registrant responds within ten business days, the Internal Abuse Team will review the response to determine if the registration or use is not abusive. If the Internal Abuse Team is satisfied by the registrant's response, the Abuse Point of Contact will submit a request to the registry services team to reactivate the domain name. If the registrant does not respond within ten business days or the Internal Abuse Team is not satisfied by the registrant's response, the Abuse Point of Contact will notify the registry services team to continue the suspension, transfer or cancel the abusive domain name, as appropriate.

The anti-abuse procedure will not prejudice either party's election to pursue another dispute mechanism, such as the Uniform Rapid Suspension System (URS) or Uniform Domain-Name Dispute-Resolution Policy (UDRP). If CRR's registrar receives notice of a URS or UDRP complaint pertaining to a domain name within the TLD, the registrar will ensure that the domain name is locked within twenty-four hours of receipt of the complaint. The registrar will also notify CRR's Abuse Point of Contact and the registrant.

28.8. Abuse Prevention

In order to further minimize abusive domain name registrations and other activities that have a negative impact on Internet users, CRR will promote the ability to contact a domain registrant using information in WHOIS by providing accessibility in a reliable, consistent, and predictable fashion. CRR will adhere to port 43 WHOIS Service Level Agreements (SLA), which require that port 43 WHOIS service be highly accessible and fast.

~~In order to ensure that only Google and its authorized affiliates are authorized to register and operate domain names within the TLD,~~ CRR will authenticate registrant information by providing an email verification link sent to the registrant to confirm its email address. In addition, we will ensure an ongoing ability to contact the registrant via email by confirming the new email address as part of changes affecting the contact information.

CRR plans to regularly monitor registration data for accuracy and completeness, employing authentication methods, and establishing policies and procedures to address domain names with inaccurate or incomplete WHOIS data. Namely, the WHOIS data will be updated to reflect that the registrant is associated with CRR and/or Google.

As required by Specification 4 of the new gTLD Registry Agreement, CRR will offer thick WHOIS services, in which all authoritative WHOIS data is maintained at the registry. Through CRR's registrar and registry services team, we will maintain timely, unrestricted and public access to accurate and complete WHOIS information, including registrant, technical, billing, and administrative contact information, identity of the registrar, domain name's expiration date, nameservers associated with the domain, and specified fields of data for the Registrant Contact, Administrative Contact, and Technical Contact.

CRR will employ query rate limiting and CAPTCHA procedures for its WHOIS database to minimize abuse of its features.

28.9. Summary and Key Insights

Abusive activity on the Internet has been a growing problem, creating security and stability issues for registrants, registrars and users of the Internet in general. CRR intends to address this issue across its TLDs by dedicating ample resources for the purpose of implementing its strict abuse policies and

procedures.

29. Rights Protection Mechanisms

Abusive registrations and uses of domain names in the global top-level domain (gTLD) will not be tolerated. The nature of such abuses creates security and stability issues for the registry, registrars and registrants, as well as for users of the Internet in general. As set forth in prior responses, Charleston Road Registry (CRR) ~~intends to operate this gTLD as a secure and closed registry, and does not plan to offer domain name registrations to third parties.~~ Charleston Road Registry (CRR) will employ a stringent verification process to establish that every prospective registrant meets the registration criteria. In addition to ~~this verification process~~ these policies, the registry promises to incorporate the following Rights Protection Mechanisms.

29.1. Rights Protection Mechanisms – Sunrise Period

~~Operation of a closed gTLD with no third-party registrants should mitigate concerns of abusive registrations.~~ Nonetheless, Ssubject to the Sunrise Eligibility Requirements (SERs) outlined herein, CRR will offer a Sunrise Period of ~~60~~30 days for owners of trademarks listed in the Trademark Clearinghouse to register domain names that contain a second level consisting of an identical match to their listed trademarks. CRR's registrar will confirm all Sunrise and Registration eligibility. As an added measure of security for brand owners, CRR will staff an internal sunrise team (the "Sunrise Contact") who will review all Sunrise registrations to ensure Sunrise and registration eligibility. The SERs, which will be verified by Clearinghouse data, will include the following: (i) proof of membership in eligible registrant class, namely, employees and/or affiliates of CRR; (ii) ownership of a mark that is (a) nationally or regionally registered and for which proof of use, such as a declaration and a single specimen of current use – was submitted to, and validated by, the Trademark Clearinghouse; or (b) that have been court-validated; or (c) that are specifically protected by a statute or treaty currently in effect and that was in effect on or before 26 June 2008; (iii) representation that all provided information is true and correct; and (iv) provision of data sufficient to document rights in the trademark.

Upon submission of all of the required information and documentation, the registrar will review the submissions and verify the trademark and eligibility information and all contact information provided for registration. The registrar shall then send confirmation messages, listing any deficiencies regarding the trademark information provided with the application. If a registrant does not cure any eligibility deficiencies and/or respond by the means listed within one week, the registrar will release the name. CRR will incorporate a Sunrise Dispute Resolution Policy (SDRP). The SDRP will allow challenges to Sunrise Registrations by third parties for a ten-day period after acceptance of the registration based on the following four grounds: (i) at the time the challenged domain name was registered, the registrant did not hold a trademark registration of national effect (or regional effect) or the trademark had not been court-validated or protected by statute or treaty; (ii) the domain name is not identical to the mark on which the registrant based its Sunrise registration; (iii) the trademark registration on which the registrant based its Sunrise registration is not of national or regional effect or the trademark had not been court-validated or protected by statute or treaty; or (iv) the trademark registration on which the domain name registrant based its Sunrise registration did not issue on or before the effective date of the Registry Agreement and was not applied for on or before ICANN announced the applications received. After receiving a Sunrise Complaint, the Sunrise Contact will review the Complaint to see if the Complaint reasonably asserts a legitimate challenge as defined by the SDRP. If the Complaint does not, the Sunrise Contact will email the complainant within 36 hours of the complaint to indicate that the subject of the complaint does not fall within SDRP, and that CRR considers the matter closed.

If the domain name is not found to have adequately met the SERs, the Sunrise Contact may alert the registrar to immediately suspend resolution of the domain name, as appropriate. Thereafter, the Sunrise Contact will immediately notify the registrant of such action, the nature of the complaint, and provide

the registrant with the option to respond within ten days to cure the SER deficiencies or the domain will be canceled. All such actions will be ticketed in Google's customer relationship management (CRM) software to maintain accurate SDRP processing records.

If the registrant responds within ten business days, its response will be reviewed by the Sunrise Contact to determine if the SERs are met. If the Sunrise Contact is satisfied by the registrant's response, it will submit a request by the registry services team to reactivate the domain name. The Sunrise Contact will then notify the Complainant that its complaint was ultimately denied and provide the reasons for the denial. If not, both the registrant and the complainant will be notified that the domain name will be released.

29.2. Rights Protection Mechanisms – Trademark Claims Service

CRR will offer a Trademark Claims Service during the Sunrise Period and plans to continue to offer the service for an indefinite period of time thereafter during general registration. CRR will staff an internal team that will be considered the Trademark Claims Contact. The registrar will verify whether any domain name requested to be registered in the gTLD is an identical match of a trademark that has been filed with the Trademark Clearinghouse. It is anticipated that a domain name will be considered an identical match when the domain name consists of the complete and identical textual elements of the mark, and includes domain names where (a) spaces contained within a mark that are either replaced by hyphens (and vice versa) or omitted; (b) certain special characters contained within a trademark are spelled out with appropriate words describing it (e.g., @ and &); and (c) punctuation or special characters contained within a mark that are unable to be used in a second-level domain name are either (i) omitted or (ii) replaced by hyphens or underscores.

If the registrar determines that a prospective domain name registration is identical to a mark registered in the Trademark Clearinghouse, the registrar will provide a "Trademark Claims Notice" ("Notice") in English on the registrar's website to the prospective registrant of the domain name. The Notice will provide the prospective registrant with access to the Trademark Clearinghouse Database information referenced in the Trademark Claims Notice to enhance its understanding of the Trademark rights being claimed by the trademark holder via a link. The Notice will be provided in real time without cost to the prospective registrant.

After receiving the Notice, the registrar will require the prospective registrant to click a link that specifically warrants that: (i) the prospective registrant has received notification that the mark(s) is included in the Clearinghouse; (ii) the prospective registrant has received and understood the Notice; and (iii) the registration and use of the requested domain name will not infringe on the rights that are the subject of the Notice.

CRR reserves the right to adopt other procedures and requirements for the Trademark Claims Service. At a minimum, it is anticipated that after the effectuation of a registration that is identical to a mark listed in the Trademark Clearinghouse, the registrar will then provide a clear notice to the trademark owner of the trademark with an email detailing the WHOIS information of the registered domain name. The trademark owner then has the option of filing a Complaint under the Uniform Domain Name Dispute Resolution Policy (UDRP) and/or the Uniform Rapid Suspension System (URS) against the domain name. As discussed in its right protection mechanisms, CRR will require in its domain name registration agreements that its registry operator and registrar providers, as well as all registrants, submit to the Uniform Domain Name Dispute Resolution Policy (UDRP) and the Uniform Rapid Suspension System (URS) procedures. CRR and its registrar(s) will abide by decisions rendered under the UDRP and URS on a timely and ongoing basis upon notification.

29.3. Rights Protection Mechanisms – URS

CRR will specify in the Registry Agreement, all Registry-Registrar Agreements, and all Registration Agreements used in connection with the gTLD that it will abide by all decisions made by panels in accordance with the Uniform Rapid Suspension System (URS). CRR's registrar will be tasked with receiving all URS Complaints and decisions. After receiving a URS complaint about a domain name

within the gTLD, the registrar will ensure that the domain name is locked within twenty-four (24) hours of receipt of a URS complaint from the URS Provider and will notify CRR's Abuse Point of Contact and the registrant. In the event of a determination in favor of the complainant, the registrant will notify the Abuse Point of Contact and the registry services provider to ensure that the registry suspends the domain name in a timely fashion and has the website at that domain name is redirected to an informational web page provided by the URS Provider about the URS throughout the life of its registration. CRR's Abuse Point of Contact will oversee and monitor the status and resolution of all URS complaints and decisions.

29.4. Rights Protection Mechanisms – UDRP

CRR will specify in the Registry Agreement, all Registry-Registrar Agreements, and all Registration Agreements used in connection with the gTLD, that it will abide by all decisions made by panels in accordance with the Uniform Domain-Name Dispute-Resolution Policy (UDRP). CRR's registrar will be tasked with receiving all UDRP complaints and decisions. After receiving a UDRP complaint about a domain name within the gTLD, the registrar will ensure that the domain name is locked within twenty-four (24) hours of receipt of a UDRP complaint from the UDRP Provider and will notify CRR's Abuse Point of Contact and the registrant. In the event of a determination in favor of the complainant, the registrant will notify the Abuse Point of Contact and the registry services provider to ensure that the registry cancels or transfers the domain name in a timely fashion as provided for by the decision. CRR's Abuse Point of Contact will oversee and monitor the status and resolution of all UDRP complaints and decisions.

29.5. Rights Protection Mechanisms – Proven Registrars

~~CRR will contract with various ICANN-accredited registrars. CRR is committed to reducing abusive registrations, and will ensure that its registrar operates accordingly. intends to utilize its parent company Google Inc. as its registrar, though it reserves the right to contract with other ICANN-accredited registrars in the future.~~
~~CRR is committed to reducing abusive registrations, and will ensure that its registrar operates accordingly.~~

29.6. Rights Protection Mechanisms – Pre-Authorization and Authentication

CRR will authenticate registrant information by providing an email verification link sent to the registrant to confirm its email address. In addition, CRR will ensure proper access to domain functions by requiring multi-factor authentication from registrants to process update, transfer, and deletion requests.

~~No name will resolve until the registrant has been verified by the internal team as an eligible registrant. It is anticipated that only Google and its affiliates will be eligible to register domain names within the gTLD. At no time during the life of the registry will CRR plan to offer domain name registrations to third-parties. CRR will staff an internal team that will pre-approve all registrations made in the gTLD by CRR and/or Google. CRR will thus verify that every prospective registrant is with CRR, Google or another affiliate of CRR.~~

~~In order to ensure that only Google and its authorized affiliates are authorized to register and operate domain names within the gTLD, CRR will authenticate registrant information by providing an email verification link sent to the registrant to confirm its email address. In addition, CRR will ensure proper access to domain functions by requiring multi-factor authentication from registrants to process update, transfer, and deletion requests.~~

~~No name will resolve until the registrant has been verified by the internal team as an eligible registrant.~~

29.7. Rights Protection Mechanisms – Grace Period

See Question 27 for a detailed discussion of CRR's policies with respect to Add Grace Periods.

29.8. Rights Protection Mechanisms – Domain Anti-Abuse Policy

CRR will implement in its internal policies and its Registry-Registrar and Registration agreements that all registered domain names will be subject to a Domain Name Anti-Abuse Policy (“Policy”). See Question 28 for a detailed discussion of CRR’s Anti-Abuse Policy.

29.9. Resourcing

Google will implement these technical requirements using the teams and resources discussed below. The cost of these services will generally be set at reasonable market rates per agreement between CRR and Google. The expected costs are discussed in Questions 46 and 47.

29.9.1. Registry Team

The Registry Team will be responsible for designing and implementing the SRS, EPP, and WHOIS systems, including implementation of the rights protection mechanisms. They will also be responsible for creating tests and monitoring for these systems.

During initial implementation, this team will consist of at least 4-7 software engineers responsible for implementing the project. Additionally, Google plans to staff one software engineer who is responsible for engineering testing and monitoring for the registry, and one software engineer who is responsible for backup, restoration and escrow. In total, Google plans to implement the registry with a team of 6-9 software engineers.

After the registry is complete, Google expects to staff a team to support the ongoing operation of the registry. This team will consist of at least four engineers who will participate in on-call rotation, respond to alerts, provide support to ICANN and registrars for emergency escalations, and maintain responsibility for bug fixes and improvements. This team will continue maintenance throughout the life of the registry.

This team’s responsibilities will generally be limited to registry-specific components. The Registry Team will work closely with other relevant teams, including the Authoritative DNS support team, Storage Site Reliability Engineering team, network engineering and operations, and customer support teams. These other teams are described in more detail in Question 31 (Section 31.16), as well as the relevant sections throughout this application.

29.9.2+. Customer Service Team

The Customer Services Team will be responsible for supporting customers and partners, including responding to abusive registrations. Google has a very large existing customer service team of both internal staff as well as staff contracted through third parties, with many hundreds of dedicated staff members already in place. Since these teams and their management are already in place, no standalone implementation resources are needed.

To continue ongoing maintenance of CRR support needs, Google plans to add additional resources for capacity as needed. Google expects to add a total of approximately fifteen additional personnel (including both Google employees and outside vendors) to support all of CRR’s customers and partners. The individual staffing allocation to each gTLD is described in Question 47.

29.10. Summary and Key Insights

CRR is committed to implementing strong and integrated intellectual property rights protection mechanisms. Doing so is critical to Google’s goals of model Internet citizenship and fostering Internet development, especially in emerging regions. Accordingly, CRR intends to offer a suite of rights protection measures which builds upon ICANN’s required policies while fulfilling our commitment to encouraging innovation, competition, and choice on the Internet.



New gTLD Application Change Request Form

Application ID:	1-1141-50966
Applying Entity:	Charleston Road Registry
Applied-for TLD:	SEARCH
Primary Contact Name:	Sarah Falvey
Primary Contact Email:	tas-contact2@google.com ; sarahfalvey@google.com
Primary Contact Phone No:	1 202 346 1230
Reason for the change request, including the relevant Question number:	<p>Rather than limiting the proposed TLD for use by Google, we propose a revised registration policy that allows for registration by any search website providing a simple query interface. We also propose a new redirect service at the “dotless” search domain (http://search/) that allows users to specify and easily access the search functionality of their choice. We believe the combination of the common query interface and redirect service will provide users with a powerful new tool to make use of the search-related services online.</p> <p>The proposed changes affect Questions 18, 23, 28 and 29.</p>

Additional Information Required

Please also provide a redlined document of the changes that you are requesting. Please be sure to include the question number(s) for the requested change(s). The redlined document should contain:

- The answer(s) exactly as entered in TAS
- Changes that you would like to make to these answers in tracked changed

18(a). Describe the mission/purpose of your proposed gTLD.

18.a. Mission/Purpose of the Proposed gTLD

Charleston Road Registry is an American company, wholly owned by Google, which was established to provide registry operator services to the Internet public. Google is an American multinational public corporation and global technology leader focused on improving the ways its hundreds of millions of users connect with information. Since its formation, Google has been developing technology that can improve upon existing ways of doing business on the Internet. Google provides a variety of services and tools for Internet users and advertisers of all sizes, from simple search features and local ads to enterprise-scale business applications and global advertising solutions. These tools make it easier for people to make use of the world's information and enable entrepreneurs and publishers around the world to grow their businesses.

In line with Google's general mission, Charleston Road Registry's mission is to help make information universally accessible and useful by extending the utility of the DNS while enhancing the performance, security, and stability of the Internet for users worldwide. Charleston Road Registry aspires to create unique web spaces where users can learn about Google products, services and information in a targeted manner and in ways never before seen on the Internet. Its business objective is to manage Google's gTLD portfolio and Google's registry operator business. As discussed further in the responses to questions 23 and 31, Charleston Road Registry intends to outsource all critical registry functions to Google Registry Services.

The mission of the proposed gTLD, .search, is to provide a domain name space that makes it easier for Internet users to locate and make use of the search functionality of their choice~~make information more useful and accessible to people around the world through the streamlined provision of Google's Internet search services. The purpose of the proposed gTLD is to provide a dedicated Internet space in which Google can continue to innovate on its Internet search offerings.~~ According to a February 2012 Pew Research study, 91% of U.S. adult Internet users use Internet search tools, and 59% do so on a daily basis [Source: <http://pewinternet.org/Reports/2012/Search-Engine-Use-2012/Main-findings/Search-engine-use-over-time.aspx>]. Google is one of the most popular Internet search engines worldwide. The proposed gTLD will open possibilities for new, more convenient ways for Internet users to navigate to the services they like and use.

18(b). How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

18.b. Benefits to Registrants, Internet Users, and Others

18.b.i.1. Specialty

~~Charleston Road Registry intends to operate the proposed gTLD as a closed registry with Google as the sole registrar and registrant.~~ The goal of the proposed gTLD is to allow Google to manage the domain name space for its Google~~provide a space dedicated to~~ Internet search offerings, and to make it easier for users to access the search functionality of their choice. The proposed gTLD will ~~provide Google with the ability to customize its domain and website names for its search offerings to~~ signal to the general population of Internet users that .search websites are indeed managed by Google~~websites that offer search functionality, adhering to basic technical standards and providing users with a simple, common interface. Google intends to make it clear to Internet users that this is the authoritative and designated space where they can find Google Search services offered solely by Google, accessible via differentiated and streamlined web addresses.~~

18.b.i.2. Service Levels

Through its association with Google, Charleston Road Registry is uniquely positioned to enable and support the proposed gTLD by providing its service reliability and speed of delivery as a part of its services. Google brings unique expertise and a proven record of excellence in infrastructure operations: Google now runs the biggest DNS system in the world, has industry-leading uptime on its services, such as web search, and offers enterprise services on which governments and businesses depend.

Charleston Road Registry's service level goal for the proposed gTLD is to ensure that, ~~Google, as the sole registrar~~ and registrants, is~~are~~ supported in delivering the high level of quality, speed, and service

to users for which #Google is known. Indeed, two of Google's core principles in providing Internet search and related goods and services are "focus on the user and all else will follow" and "fast is better than slow."

In focusing on the user, Google strives to provide the best user experience possible. Google will continue to operate under this principle when designing new offerings and providing goods and services within the proposed gTLD.

Google keeps speed in mind with each new product it releases, from faster mobile applications to improved Web browsers designed for rapid search and navigation. Google continues to devote its resources to improving speed and efficiency. In managing the proposed gTLD, Google expects to keep its service reliability and speed to this standard through direct management of all technical infrastructure related to DNS resolution other than the operation of the root servers.

Charleston Road Registry is committed to using the most technologically advanced, secure, and reliable registry and registrar services for all of the domain names within the gTLD so as to not compromise the service levels, security, and stability of the gTLD to users across the globe.

18.b.i.3. Reputation

Google has a proven record of providing high-quality, secure online services. Charleston Road Registry seeks to enhance Google's reputation for excellence, superior quality, and high level of security and to become known as an exemplary domain name services provider.

When Internet users visit a domain name in the proposed gTLD, they will be able to reliably expect and experience the high level of security and quality on which Google's reputation has been built.

The registry will be structured

~~In addition, Charleston Road Registry intends to apply for an exception to ICANN's Registry Operator Code of Conduct and operate the proposed gTLD with Google as the sole registrar and registrant. This facilitates Google's ability to further enhance the reputation of its Internet Search brand in such a way that Charleston Road Registry will enable registrars to register and oversee second-level domain names in the proposed gTLD; that registrars develop and deploy a reasonable process for ensuring that those domain names are used for gTLD-relevant purposes as specified in the registry-registrar agreement; that the WHOIS is thick and reliable; and that the registry is responsive to legal rights owners (if applicable).~~

Charleston Road Registry plans to develop and publish eligibility criteria for all registrants in the proposed gTLD and will work with its registrars to execute the eligibility verification process. This process will imbue additional meaning to all second-level domains in the gTLD and enhance the gTLD's reputation by establishing an authoritative community of websites that offer search functionality. When Internet users visit a website in the proposed gTLD environment, they will be able to reliably expect services relevant to the proposed gTLD.

18.b.ii.1. Competition

Charleston Road Registry supports the advancement of registry operators as a whole and the diffusion of gTLDs amongst diverse stakeholders to generate increased competition for the benefit of the Internet public. Increased competition will result in more competitive prices for consumers, additional efficiencies and increased productivity in enterprises, and spur innovation in the gTLD space.

The proposed gTLD, .search, will provide a new online structure for the aggregation of websites with search functionality, and will allow users to more easily access their search functionality of their choice. In addition to offering a new namespace for websites with search functionality, the gTLD will offer a unique capability that will allow them to easily conduct queries against the search functionality of their choice. The .search gTLD will also encourage websites with search functionality to adopt common query frameworks, which may allow the emergence of new services and make it easier for

users to switch between search functionality.

Managing this namespace will allow Charleston Road Registry to provide to registrars and registrants the high level of technical operations quality and service for which Google is known, which in turn will incent other existing and new gTLDs to improve the quality of their offerings.

Charleston Road Registry will facilitate a fair and equitable registrar process, providing open access to any registrar who meets ICANN accreditation guidelines and fully complying with the Registry Operator Code of Conduct. Charleston Road Registry is committed to treating all registrars equitably and will not offer preferential treatment to Google in its capacity as registrar or registrant. .search will operate as a closed gTLD. It will provide Google with the opportunity to differentiate and innovate upon its Google Search products and services through its use of the gTLD. This will promote competition in the gTLD space by inciting competitors to respond with improved gTLD operations, greater range and higher quality products and services, and/or the creation of their own respective gTLDs, to the benefit of all Internet users. Launching the proposed gTLD will also generate increased competition in the online marketplace by adding incremental availability to the second-level domain pool.

18.b.ii.2. Differentiation

The proposed gTLD will clearly be differentiated from other gTLDs due to its purposefully limited scope. This differentiation includes: (1) uniqueness in terms of the users/registrants the proposed gTLD seeks to benefit; (2) a clear indicator that second level domains within the gTLD offer a particular, targeted contentservice; (3) and that Google will be able to affix Google's well-known brand to second-level domains, and as a result Internet users will immediately know the source of the gTLDthe “dotless” search domain name will provide a unique capability not provided in any other TLD.

The .search gTLD will provide a new mechanism whereby websites with search functionoanlity can enact second-level domains that offer search-related services. This signification is not currently available in the gTLD space.

The gTLD will provide an authoritative environment for the exclusive provision of the range of Google Search content, goods, and services to Internet users. New, higher quality products offered in the gTLD will also attract new users to the Google offering.

The .search gTLD provides Google with the opportunity to differentiate its Google Search products and services by linking them to a unique gTLD. Google will be able to quickly distinguish new products and services it develops and/or acquires by offering them in the proposed gTLD.

The gTLD will also allow Google to more securely work in communities where access to dependable and safe online services are limited or fragmented and provides the opportunity to reach a broader cross-section of current and potential global Internet users.

18.b.ii.3. Innovation

The .search gTLD is both innovative in its own right, and will encourage further innovation related to web-based search.

The gTLD itself is innovative in three important respects. First, it provides a unique space dedicated to websites with search functionality. Second, it provides a simple technical standard describing how users and other software can interact with search functionality within the TLD. Third, the dotless search domain will provide a unique service that allows the user to easily access the search functionality of their choice.

In addition to the innovation that the gTLD itself represents, .search provides a new namespace in which new search-related concepts may emerge rather than relying on existing popular but congested

gTLD namespace. Even more importantly, a consistent query interface across all search websites in the TLD makes it easier for third-party developers to create new and innovative services that will allow users to interact with search functionality in new and creative ways.

~~Through innovation and iteration, Google consistently aims to improve upon technologies that connect people with information. One of its core principles is “great isn’t good enough.” One example of this belief in action is Google’s introduction of Gmail storage capacity far exceeding other email service providers’ capacity limits at the time, which eventually led to substantially improved offerings from a wide range of providers. Google is committed to anticipating needs not yet articulated by its global audience, and meeting them with products and services that set new standards. The proposed gTLD will spur further innovation at Google by providing an accelerated platform for the introduction of new offerings to the public. The proposed gTLD will also provide a mechanism for enhanced branding and management of Google content, products, and services. The proposed gTLD, .search, will promote innovation by allowing Google to develop new ways for users to find and access Search services and to distinguish among related services. In addition, Google may choose to innovate within its portfolio of web spaces and introduce distinguishing feature(s) that further crystallize the relationship between content offered in the gTLD and the Google brand and reputation.~~

18.b.iii. User Experience

Charleston Road Registry will strive to provide the highest level of user experience through operational stability, security and performance to serve the interest of registrants in the proposed gTLD. Charleston Road Registry is uniquely positioned to provide this level of experience given its relationship with Google; Google invested over \$3 billion in its IT infrastructure in 2011 and maintains a record of excellence in infrastructure operations.

The .search gTLD will improve users' experience on the Internet in several important ways.

First, users will recognize domains within the .search gTLD as providing search capabilities. This sort of descriptive search-related designation does not exist today.

Second, all search websites within the .search TLD will provide a common query interface that will allow users and third party developers to interact with a variety of search websites consistently.

Third, Charleston Road Registry will provide a service on the dotless search domain that will allow users to designate the search functionality of their choice and then perform queries that will automatically be redirected to the appropriate website. This facility should provide simple, consistent access to the user's preferred search functionality that does not exist today.

In sum, these services make it easier for users to identify and make use of search funct on the Internet. Charleston Road Registry and Google, as the registry operator and registrant respectively, will take great care to ensure that users’ needs are served. Google anticipates that the proposed gTLD will provide its users around the globe with Google Search services in a more stable, secure, and expedient manner than ever before.

~~The .search gTLD will provide Google with the opportunity to distinguish the web spaces it owns and operates from current spaces online, making it easy for Internet users to efficiently locate Google Search services. Users will now be able to clearly identify and select specific sites based on their preferences and readily experience the level of service and content quality they expect from Google. The proposed gTLD will provide a more trusted and user-friendly environment where domain names and content related to the .search gTLD can flourish. Charleston Road Registry seeks to have users~~

~~deem the gTLD trustworthy and reliable and recognize it as an aggregated source of specific goods, services, and information.~~

~~The proposed gTLD, furthermore, facilitates an improved online user experience through greater structure and categorization on the Internet.~~

18.b.iv. Registration Policies

~~The proposed gTLD will provide a dedicated and secure environment for Google to offer the high-quality Google Search-related products and services it currently offers on Google-branded websites namespace dedicated to use by websites that provide search functionality. Registration within the gTLD will be limited to sites conforming to a simple technical standard, as described below. Beyond the implementation of this technical standard, Charleston Road Registry will not attempt to define what qualifies for registration—for example, no judgments about the type of information searched or the quality of search results will be applied in determining eligibility to register within the gTLD. To preserve the integrity of the gTLD, Charleston Road Registry reserves the right to adopt certain monitoring measures, including periodic audits. Charleston Road Registry also reserves the right to adopt enforcement measures, including a request that registrars facilitate a user reporting method to log complaints and/or potential instances of misuse within the gTLD. If a registrant is found to be in violation of the terms of the registry-registrar agreement or the registrar-registrant agreement, Charleston Road Registry may request that the appropriate registrar enforce such agreements through penalties, including but not limited to suspension of the domain name.~~

~~Charleston Road Registry will also develop policies to limit registrations within the domain to the names that registrants commonly use in trade related to their provision of search-related services, possibly including restricting registrations to exact matches of trademarks~~

~~In addition to registration criteria, in order to preserve the integrity of the end user experience with regard to the gTLD, Charleston Road Registry may adopt policies to prevent abusive behaviors by registrants including, but not limited to attempts to circumvent users' ability to designate the search functionality of their choice within the gTLD, or attempting to confuse users as to the nature of services provided.~~

TECHNICAL REQUIREMENTS FOR REGISTRATION WITHIN THE .SEARCH GTLD:

All second level registrations within the .search gTLD must support a simple technical standard that will allow consistent and predictable access to that site's search functionality. These requirements are as follows:

- There must be an A record (and, ideally, a AAAA) record for the second level domain name; these records should point to a server supporting HTTP on port 80 (and, ideally, HTTPS on port 443). Charleston Road Registry reserves the right to make the use of IPv6 addressing and HTTPS mandatory in the future.

- The HTTP interface must support GET requests to the URL consisting simply of “http://[SLD].search/”, where [SLD] is replaced by the relevant second level domain name. This interface must accept query strings with a field of “q” and a user-supplied value that represents the search query. For example, a search for the term “bar” against the “foo.search” second level domain would generate a GET request to the following full URL, including query string: http://foo.search/?q=bar.

- The HTTP interface must return some form of result in response to the request. Charleston Road Registry believes that given its intended use by Google, the .search gTLD will best add value to the gTLD space by remaining completely closed for the sole use of Google.

~~Second level domain names within the proposed gTLD are intended for registration and use by Google only, and domain names under the new gTLD will not be available to the general public for purchase, sale, or registration. As such, Charleston Road Registry intends to apply for an exception to the ICANN Registry Operator Code of Conduct as Google is intended to be the sole registrar and registrant.~~

~~Charleston Road Registry's intention is to satisfactorily meet all stated exemption criteria for the operation of a closed gTLD. All domain name registrations in the gTLD will be registered to, and maintained by, Google for its own exclusive use. Charleston Road Registry will only distribute or transfer control or use of any registrations in the gTLD to Google and its affiliates, meaning a person or entity that, directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under common control with, the person or entity specified, and (ii) "control" (including the terms "controlled by" and "under common control with") means the possession, directly or indirectly, of the power to direct or cause the direction of the management or policies of a person or entity, whether through the ownership of securities, as trustee or executor, by serving as an employee or a member of a board of directors or equivalent governing body, by contract, by credit arrangement or otherwise. In providing services that make the world's information universally accessible and useful, Charleston Road Registry believes the public interest is served by Google's role as the sole registrar and registrant of the gTLD.~~

~~Google's existing business and marketing decision-making channels will define policies and make decisions regarding the registration and use of domain names first and then submit them to Charleston Road Registry for registry approval. The registration and use of domain names in the gTLDs will also be shaped by the abuse prevention and rights protection policies outlined in Responses 28 and 29.~~

~~18.b.v. Protection of Privacy and Confidential Information~~

~~Charleston Road Registry intends to apply for an exception to ICANN's Registry Operator Code of Conduct and operate the proposed gTLD with Google as the sole registrar and registrant.~~

~~Charleston Road Registry will strive to ensure the appropriate level of privacy and security will be met for its users. Although Google will be the only registrant (and only registrar) in the gTLD, Charleston Road Registry and its provider of registry services, Google, have imposed measures to help achieve this protection for end users of the domain; additional specifics regarding the practices for the registry include but are not limited to the following:~~

~~-All data transmitted from registrars to the registry will be encrypted using TLS or other similar data protection schemes to ensure that third parties cannot access personally identifying information or other sensitive data as it crosses the Internet.~~

~~- Charleston Road Registry will attempt to prevent the misuse of WHOIS data for improper purposes such as spam, intellectual property theft or phishing. Charleston Road Registry will attempt to identify patterns of abusive usage of WHOIS and will appropriately use CAPTCHA, query throttling or other techniques to prevent information scraping.~~

~~- Google will restrict access to data and information systems maintained by the registry to a specific list of individuals involved with supporting the Google Registry system in production. Google will review this list on a periodic basis to ensure that the level of access granted to individuals is appropriate. Google uses two-factor authentication and other mechanisms to ensure that staff with access to user information are properly identified prior to using registry systems.~~

~~- Google data backups stored offsite are encrypted with passwords that are securely managed on Google's internal systems. Google can effectively remove the ability to access this data by destroying the relevant encryption password.~~

- Supplying Google account information will be optional for registrants unless the domain registration is directly associated with another Google product offering. Google will not disclose Google account information except for any contact information provided by the user that is required by ICANN to be displayed in response to a WHOIS query.

- Registrar billing and payment information will not be stored alongside domain name registration information. All registrar billing and payment information will be stored in a PCI-compliant billing system similar to that used by Google Ads.

- Data will not be shared with third parties without permission of registrants, except as required for registry operations or as required under the law, such as in response to a subpoena, other such court order, or demonstrated official need by law enforcement.

Beyond these specific mechanisms, both Charleston Road Registry and Google will govern its approach to privacy by the Google Privacy Policy. This policy applies to registrars, registrants and end users of registry services such as DNS zone publication and WHOIS data publication. The Privacy Policy is located at <http://www.google.com/policies/privacy/>.

18.b.vi. Outreach and Communications Efforts

Once Charleston Road Registry begins developing public-facing resources in its gTLD, it intends to inform the public about the gTLD and the ~~Googlesearch~~-related information, ~~goods~~, and services available there through investments in marketing and public relations. ~~Outreach and communication efforts will focus on promoting the fact that all domain names and websites on the proposed gTLD will be operated and backed by Google. Google, as the sole registrar and registrant, will have the opportunity to further advertise and promote this new brand presence to raise user awareness and increase usage of sites in the new gTLD.~~

~~Charleston Road Registry intends to promote gTLDs under its purview collectively, such that the public gains an awareness and understanding of new gTLDs and the availability of new second-level domain space on the Internet. Charleston Road Registry believes that this approach will make the strongest impact in modifying consumer behavior and is the best path to achieving success for all new gTLDs collectively.~~

Charleston Road Registry intends to promote gTLDs in its portfolio collectively, such that the public gains an awareness and understanding of new gTLDs and the availability of new second-level domain space on the Internet. Charleston Road Registry believes that this approach will make the strongest impact in modifying consumer behavior and is the best path to achieving success for all new gTLDs collectively.

Charleston Road Registry will reach out to the Internet community via a number of different outreach and communications methods and venues to deliver its mission and message to the public, including but not limited to: press briefings, videos posted on various Internet sites, blogs and other social media, and paid advertising. In addition, when developing resources for localized Internet registrars in different global regions, Charleston Road Registry will use local marketing and communications platforms as needed.

18(c). What operating rules will you adopt to eliminate or minimize social costs?

18.c. Minimizing Social Costs and Other Negative Consequences

18.c.i

~~Members of the public will not be able to register domain names in this new gTLD. Registration will be managed by Charleston Road Registry, and only a limited number of designated Google personnel will be able to register domain names. If multiple parties associated with Google express an interest in registering the same domain name, the designated personnel will make the decision regarding which internal party's registration and use of the domain name is a higher business priority. Potential registrants will need to meet stated registration policy criteria to register domain names in the proposed gTLD.~~

Registration will be managed by Charleston Road Registry in three phases.

Phase 1 - The first phase will be an extended 60-day sunrise phase. Only owners of trademarks listed in the Trademark Clearinghouse may participate in this phase, and such owners may register domain names that consist of an identical match to their listed trademarks. At the end of the sunrise phase, at a minimum, Charleston Road Registry will follow ICANN rules for subsequent attributions of trademarked second-level domains and will offer other protections for trademark owners, including but not limited to an extended Trademark Claims Service of indefinite length.

Phase 2 - The second phase will be a four-week open registration phase. During this phase, any interested applicant may apply for all second-level domain names not previously registered in the sunrise period. Trademarked terms will be subject to the Rights Protection Mechanisms set forth in Response 29. At the end of the second phase, if multiple parties have expressed an interest in registering the same second-level domain name, Charleston Road Registry will award the domain name through an auction to the highest bidder.

Phase 3 - The third phase will be a steady state phase for the duration of registry operation. During this phase, any interested applicant may apply for all second-level domain names not previously registered in an earlier phase. Trademarked terms will be subject to the Rights Protection Mechanisms set forth in Response 29. If multiple parties express an interest in registering the same domain name, Charleston Road Registry will award the domain name on a strictly first-come, first-served basis.

18.c.ii

While Charleston Road Registry reserves the right to charge different prices for unique second-level domains within the gTLD, once Charleston Road Registry determines the price for a particular second-level domain, Charleston Road Registry will not price discriminate among ICANN-accredited registrars. Charleston Road Registry does not intend but reserves the right to offer introductory discounts and bulk registration discounts. Volume discounts, marketing support and incentive programs may be made available, and if so will be offered to all ICANN-accredited registrars without preference.
~~Members of the public will not be able to register domain names in this new gTLD. Registration will be managed by Charleston Road Registry, and only a limited number of designated personnel will be able to register domain names. As registrations will be granted based on Google business needs, Charleston Road Registry will charge prices commensurate with overall business costs. Therefore, there are no specific cost benefits for registrants to implement as Google is the sole registrant.~~

18.c.iii

Pursuant to the ICANN-Registry Operator Agreement, Charleston Road Registry will provide written notice a minimum of 30 days prior to any increases in price for initial registrations, as well as written notice 180 days prior to any increase in registration renewals. Further, Charleston Road Registry will offer uniform pricing for renewals as specified in the ICANN-Registry Operator Agreement.

Charleston Road Registry does not currently intend to make contractual commitments to registrants

~~regarding the magnitude of price escalation. Charleston Road Registry does, however, intend to keep its practices competitive and aligned to activity in the marketplace. Members of the public will not be able to register domain names in this new gTLD. Registration will be managed by Charleston Road Registry, and only a limited number of designated personnel will be able to register domain names. As registrations will be granted based on business needs, Charleston Road Registry will charge prices commensurate with overall business costs. Therefore, contractual commitments to registrants regarding price escalation are not relevant to Google's mission or goals for the new gTLD at this time, as Google is the sole registrant.~~

Registry Services

23. Provide name and full description of all the Registry Services to be provided.

Charleston Road Registry (CRR) will outsource the entirety of its technical operations to Google. In addition to running the technical platform, Google will provide CRR with staffing and support to ensure that all registry services meet both the requirements laid out by ICANN in the new generic top-level domain (gTLD) Applicant Guidebook as well as in the gTLD registry agreement. Additional details of Google's provision of services to CRR are set forth in Question 31, Section 31.1.

By making use of Google's Registry platform, CRR will provide the following registry services:

- Receipt of data from registrars concerning registration of domain names and name servers
- Dissemination of top-level domain (TLD) zone files
- Dissemination of contact or other information concerning domain name registrations (WHOIS service)
- Internationalized Domain Names (IDN) Support for all domain names
- Domain Name System Security Extensions (DNSSEC) support
- IPv6 Support
- Data escrow
- Redemption grace period for domain names
- Registrar and developer account creation

- Search redirect service

"Q23_Registry Services Diagram" shows major services being exposed by high-level systems. Note that this diagram shows only data flow and does not specify the physical deployment characteristics of these services.

Details on these services are discussed below.

23.1. Receipt of Registration Data

Google will receive registration data from users in a manner consistent with standard registry operations. This will be handled via the extensible provisioning protocol (EPP) interface through ICANN-accredited third-party registrars. Google will operate a robust Shared Registration Service (SRS) that allows registrars to add, modify, and delete domain registrations and provides full support for the domain registration lifecycle.

Google's shared registration system (SRS) infrastructure consists of three major components: an extensible provisioning protocol (EPP) server that provides an EPP interface to registrars; the Google SRS Frontend, which provides web-based access to the state of the Google Registry, the registrar's profile and access to registration reports for the registrar; and the Google SRS Backend, which implements most business logic, interacts with the data store, and pushes updates to DNS and WHOIS servers in order to disseminate TLD Zone files as well as registrant contact information.

Details of the SRS are described in Question 24, EPP support in Question 25, and the registration lifecycle in Question 27.

23.2. Dissemination of TLD Zone Files

TLD zone data will be propagated in near real time to Google's Authoritative DNS infrastructure, which will serve as the primary means of publication of the TLD zone files. This DNS infrastructure is based on Google's existing Public DNS product, which handles over 70 billion queries per day. This DNS implementation will be fully compliant with RFCs 1034, 1035, 1982, 2181, 2182, 2671, 3226, 3596, 3597, 3901, 4343, 4472, 4972, and 5966 as well as ICANN's Specification 10. A full description of Google's Authoritative DNS infrastructure is described in Question 35.

In addition to real-time publication via port 53, the Google Registry will also support publication of the entire zone, as described below:

The master zone file will be internally generated and cached in the Google Shared Registration System (GSRS) as modifications to GSRS's persistent store are made. The zone data will be signed by the Authoritative DNS infrastructure; a copy of the signed data is also returned to the GSRS. The entire master zone file will then be available to authorized parties at an HTTP URL shared with them over the web.

The master zone file at this location will be guaranteed to be no more than one hour old.

When retrieving the zone file, the client will pass a single HTTP request parameter ("key"), in order to identify individually the qualified client requesting access. This parameter will be the API key given to the registrar during account signup.

The mimetype "text/dns" will be set on the HTTP response and the content encoding will be gzip.

The master zone file will follow the format specified by RFC 1035, with the additional restrictions as specified in Specification 4, Section 2.1.4 of the gTLD Applicant Guidebook. DNSSEC resource records will also be present.

In addition, the master zone file will be made available through the Centralized Zone Data Access Provider as specified in Specification 4, Section 2.1.4 of the gTLD Applicant Guidebook.

23.3. Dissemination of Contact Information (WHOIS)

Google will create an implementation of the WHOIS protocol (as defined by RFC 3912) that will listen on port 43 for WHOIS requests. Google's WHOIS service will communicate to the name registry through a private API end-point in order to retrieve the necessary information for WHOIS responses. In addition, Google will operate a public WHOIS, web-based Directory Service at

⟨WHOIS.nic.search⟩ providing free, public query-based access. Both traditional WHOIS and web-based WHOIS will be made available over both IPv4 and IPv6.

As required by Specification 4 in the gTLD Applicant Guidebook, Google's WHOIS service will perform in the following manner:

- Semi-free text format followed by a blank line and disclaimer specifying the rights of the Registry Operator, and user querying the database.
- Each data object shall be represented as a set of key/value pairs, with lines beginning with keys, followed by a colon and a space as delimiters, followed by the value.
- For fields where more than one value exists, multiple key/value pairs with the same key shall be allowed.
- The first key/value pair after a new-line starts a new record, and is used to identify the record itself.
- The format of fields governed by EPP RFCs 5730-5734 (domain status, individual and organizational names, address, street, city, state/province, postal code, country, telephone and fax numbers, email addresses, date and times) will be formatted as specified by those RFCs.

Updates to WHOIS data will be made in near real-time, with the registry's service level agreement (SLA) committing to 95% of the updates reaching the serving infrastructure within 15 minutes. Details of WHOIS support are included in Question 26.

23.4. Internationalized Domain Names

IDNs allow registrars to register domain names with unicode code points representing non-ASCII-based character sets. IDNs constrained by the IDN Tables for this TLD will be supported by the Google

Registry. Google's IDN implementation will make use of the IDNA standard and be fully compliant with both RFCs 5890-5893 and ICANN's IDN implementation guidelines. For more information on the IDN implementation for the TLD, see Question 44.

23.5. DNS Security Extensions

The Google Registry will support DNSSEC. In particular, registrants will be able to specify a DS record as part of normal domain name registration with their registrars, which will be transmitted to the Google Registry via its EPP interface. The Google Registry will then sign the DS record, along with all other DNS resource records in the TLD Zone, forming a chain of trust between the Google Registry and second-level domain name. The Google Registry itself will publish its own DS record with the root. Google's DNSSEC implementation will be fully compliant with RFCs 4033, 4034, 4035, 5910, 4509, 4641, and 5155. More information on this topic, including the DNSSEC Policy statement for the TLD is contained in Question 43.

23.6. IPv6 Support

The Google Registry operates on Google's production network, which supports IPv6. Specifically, the Google Registry will specifically support IPv6 access to all registry service endpoints (WHOIS, EPP, DNS, etc.). All services are provided through dual-stack, which is considered the industry-standard best practice for supporting IPv6. In addition, domain name registrants will be able to create IPv6 AAAA glue records for nameservers in the TLD zone. Further detail about Google's IPv6 implementation is available in Question 36.

23.7. Data Escrow

Google will escrow relevant registration data, as required by ICANN's registry agreement. Google will ensure that its data escrow will be fully ICANN compliant and performed in accordance to industry best practices. In addition to Google's practice of hosting critical data on redundant and geographically disparate datacenters, data escrow will provide further assurance against data loss and ensure that all Google Registry data can be retrieved in a timely manner. For more information on Data Escrow, see Question 38.

23.8. Redemption Grace Period for Domain Names

After a domain name has been deleted by a registrar, the domain name shall move into a Redemption Grace Period. The status of the domain will be listed as PENDING DELETE RESTORABLE. When a domain is in this state, it is deleted from the zone for the TLD. This is a strong indicator to the registrant that it must act take action in order to restore the domain to its previous state. For details, see Question 27.

23.9. Creation of Registrar and Developer Accounts

Google's Registry will use Google Accounts to manage registrars.

To create a Google Account, all parties will be directed to the following URL:

<http://www.google.com/accounts>

Once a prospective registrar or developer has created an account in Google, the registrar or developer can upgrade from a standard Google account to a registrar and/or developer, if certain requirements are met.

To obtain a set of credentials used to interact with the Google Registry, a registrar will proceed through the following workflow:

- A. The Google registrar logs in with Google account credentials.
- B. The Google registrar submits an application identifying that it is an accredited ICANN registrar, and that it wishes to interact with the Google Registry.
- C. The Google registrar requests and resets initial EPP credentials, which are separate from a Google account.

Once a Registrar has been certified and authorized for billing, they will be ready to interact with Google through Google EPP. At this point, the registrar can also view reports on domains registered, EPP transactions, remaining account balance, and other TLD registry statistics.

“Q23_Registrar Registration Process Diagram” shows the registration process for registrars. In addition to registrars, Google will also provide accounts to developers and other authorized users, who will obtain credentials through the following workflow:

- A. The developer logs in the previously created Google account.
- B. The developer requests an API key to be used for all public API calls.
- C. The developer reviews access restrictions, quota, and service-level agreements and agrees to appropriate terms.
- D. Google Registry grants access to zone data exported by the domain.

“Q23_Developer Registration Process Diagram” shows the registration process for developers.

23.10 Search Redirect Service

Charleston Road Registry will operate a service that allows users to easily perform searches using the search functionality of their choice. This service will operate on the “dotless” search domain name (<http://search/>) and provide a simple web interface. This interface operates in two modes:

1) When the user has not set a preference for a search engine, they will be prompted to select one. The user will be provided with a simple web form that will allow them to designate a search engine by entering the second level label for any second level domain registered with in the TLD (e.g., if “foo.search” was a valid second level domain name, the user could indicated that their preferred search engine was “foo”). The user can also elect to save this preference, in which case a cookie will be set in the user's browser. This cookie will be used in the second mode, as described below. If the user enters an invalid name, they will be prompted again to provide a valid response.

2) If the user has already set a preferred search engine, the redirect service will redirect the initial query to the second level domain name indicated by the user's preference, including any query string provided by the user. For example, if the user had previously selected the “foo” search engine and had issued a query for <http://search/?q=bar>, the server would issue a redirect to <http://foo.search/?q=bar>. In this manner, the user's query will be consistently redirected to the search engine of their choice.

In the event that the domain name registration related to the user's preference lapses or otherwise becomes invalid, the next query sent by the user to the redirect service will prompt the user for a new search engine preference.

The redirect service will be operated on the same robust, high-performance platform that Google uses to provide some of the most resource-intensive and often-used applications on the Internet, including Google Search, Gmail and YouTube. This infrastructure is described in more detail in Question 31.

28. Abuse Prevention and Mitigation

~~It is anticipated that only Google and its affiliates will be eligible to register domain names within the top-level domain (TLD). At no time during the life of the registry does Charleston Road Registry (CRR) plan to offer domain name registrations to third-parties, and CRR will employ a stringent verification process to establish that every prospective registrant meets the registration criteria. In addition to this verification process, we will implement strict policies and procedures to minimize abusive domain name registrations and uses and other activities that have a negative impact on Internet users.~~

~~Specifically, w~~We will implement in our internal policies and in our Registry/Registrar and Registration Agreements that all registered domain names will be subject to a Domain Name Anti-Abuse Policy (“Abuse Policy”). The Abuse Policy will provide CRR with broad power to suspend, cancel, or transfer

domain names that violate the Abuse Policy. We plan to post the Abuse Policy on a publicly facing website at nic.search/abuse, which will provide a reporting mechanism whereby violations of the policy can be reported by those who are impacted; an easy to find place to report policy violations; “plain language” definitions of what constitutes a “reportable” problem; and compliance processes to provide due process, and sanctions that will be applied, in the case of policy violations. The nic.search/abuse website will list CRR’s Abuse Point of Contact. The Abuse Point of Contact shall consist of, at a minimum, a valid e-mail address dedicated solely to the handling of abuse complaints. CRR will ensure that this information is kept accurate and up to date and will be provided to ICANN if and when changes are made. The Abuse Point of Contact will review complaints regarding an alleged violation of the Abuse Policy.

28.1. Abuse Tracking

CRR also plans to catalog all abuse communications in Google’s customer relationship management (CRM) software using a ticketing system and to maintain records of all abuse complaints for an appropriate amount of time. We shall only provide access to these records to third parties under limited circumstances, such as in response to a subpoena or other such court order or demonstrated official need by law enforcement.

The Abuse Policy will define abuse as an action that:

- a. Causes actual and substantial harm, or is a material predicate of such harm; and
- b. Is illegal or illegitimate, or is otherwise considered contrary to the intention and design of a stated legitimate purpose, if such purpose is disclosed.

We further anticipate that the Abuse Policy will state that ~~only Google and its authorized affiliates are authorized to register and operate domain names within the TLD, and that it~~ [Charleston Road Registry and accredited registrars](#) conducts an ongoing verification process designed to establish that a prospective registrant meets the registration criteria, namely that the registration ~~was made by Google or an authorized affiliate~~ [complies with the technical standards described in Question 18.b.iv.](#)

28.2. Abuse Definitions

The Abuse Policy will also name and provide basic definitions as to what constitutes the abusive registration and/or use of domain names within the TLD. These will include, but not be limited to, the following activities:

1. Unqualified Applicant - not authorized to register domain name;
2. Child Pornography - Web sites that contain content that exploits children, such as child pornography (including cartoon child porn) or content that presents children in a sexual manner;
3. Fake renewal notices - Fake renewal notices are misleading correspondence sent to registrants from an individual or organization claiming to be or to represent the current registrar. These are sent for a variety of deceptive purposes, such as obtaining an unnecessary fee (fraud); getting a registrant to switch registrars unnecessarily (“slamming”, or illegitimate market-based switching); or to obtain registrant credentials or authorization codes to facilitate theft of the domain;
4. Cross-TLD Registration Scam - a deceptive sales practice where an existing registrant is sent a notice that another party is interested in or is attempting to register the registrant’s domain string in another TLD;
5. Domain kiting/tasting - Registrants may abuse an Add Grace Period through continual registration and deletion of domain names to test their monetization (“tasting”), and re-registration of the same names in order to avoid paying the registration fees (“kiting”);
6. Phishing - a Web site fraudulently presenting itself as a trusted site (often a bank) in order to deceive Internet users into divulging sensitive information (e.g. online banking credentials, email passwords);
7. Spam - use of electronic messaging systems from email addresses from domains in the TLD to send unsolicited bulk e-mail;
8. Malware/Botnet Command-and-Control - Malware authors sometimes use domain names as a way to control and update botnets. Botnets are composed of thousands to millions of infected computers

under the common control of a criminal. Botnets can be used to perpetrate many kinds of malicious activity, including distributed denial-of-service attacks (DDoS), spam, and fast-flux hosting of phishing sites;

9. Use of Stolen Credentials –such as stolen credit card numbers, to register domain names for malicious purposes;

10. Pharming - redirecting of unknowing users to fraudulent Web sites or services, typically through domain name system (DNS) hijacking or poisoning;

11. Fast flux hosting - use of fast-flux techniques to disguise the location of Web sites or other Internet services, or to avoid detection and mitigation efforts, or to host illegal activities. Fast-flux techniques use DNS to frequently change the location on the Internet to which the domain name of an Internet host or name server resolves. Fast flux hosting may be used only with prior permission of CRR;

28.3. Abuse Policy Rights Reserved

The Abuse Policy will state, at a minimum, that CRR reserves the right to deny, cancel, or transfer any registration or transaction, or place any domain name(s) on registry lock, hold, or similar status, that it deems necessary, in its discretion: (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of CRR, as well as its affiliates, subsidiaries, officers, directors, and employees; (4) per the terms of the registration agreement or any agreement CRR has with any party; (5) to correct mistakes made by CRR, its registry services provider, or any registrar in connection with a domain name registration; (6) during resolution of any dispute regarding the domain; and (7) to remedy the abusive registration or use of any domain name.

28.4. Orphan Glue

~~For closed registries, there is unlikely to be orphan glue. Nonetheless, the following policy will apply to the TLD.~~ We will remove orphan glue records for names removed from the zone when provided with evidence in written form to the Abuse Point of Contact that the glue is present in connection with malicious conduct according to Specification 6 of the New gTLD Registry Agreement. Google's back-end systems will also periodically search for orphaned glue. We will inform its registrants that it removes glue if the covering zone is removed, and thus registrants should not reference it from outside the domain.

28.5. Resourcing

CRR and its affiliates will commit ample resources for the purpose of implementing its internal policies and its Registry/Registrar and Registration Agreements. As described herein, we will create an Internal Abuse Team, including an Abuse Point of Contact, whose responsibilities will include reviewing, responding, cataloging, and, if applicable, remedying complaints regarding alleged violations of the Abuse Policy. This team will be dedicated to manually reviewing abuse complaints. The roles and responsibilities of the team members are anticipated to include, but are not limited to, the following:

- Reviewing, responding, and if applicable, resolving complaints regarding alleged violations of the Abuse Policy
- Enforcing the Abuse Policy
- Monitoring productivity and efficiency of the manual review process
- Addressing high priority escalations from Law Enforcement quickly
- Collaborating with internal and external partners to drive issues to resolution
- Interface with the technical team to improve workflow, prioritize escalations, create tools for the manual review process

28.6. Anti-abuse Notice and Takedown Procedure

In order to reduce abusive registrations that affect the security of the TLD and its users, CRR plans to provide a domain anti-abuse notice and takedown procedure. Specifically, we will operate an anti-abuse website at the URI address nic.search/abuse that will provide the contact information for the

Abuse Point of Contact. The nic.search/abuse website will prominently display CRR's Abuse Policy and a fill-in section wherein the user will then be asked to fill in several fields, including the user's identity and contact information, and the identity and relevant information of the individual or organization that is making an abusive registration or use of a domain name within the TLD, and specific details on how, why, and when the complainant believes the registration or use of the domain name is abusive. The user will be asked to read the Abuse Policy before it submits a complaint and then click on a check box to indicate that the user has read and understands the Abuse Policy.

28.7. Abuse Response

CRR will then provide a targeted response time as to the decision regarding the complaint. We will review with the Internal Abuse Team and render a decision regarding the alleged abuse, and decide whether to deny, cancel, or transfer any registration or transaction, or place any domain(s) on registry lock, hold, or similar status that violates the Abuse Policy, if applicable. In accordance with the applicable terms of service, CRR reserves the right to terminate the accounts or domains of repeat abusers.

Specifically, the process is anticipated to occur as follows: an email containing the information relayed in the complaint will be sent to the Abuse Point of Contact. The Abuse Point of Contact will send an email to the complainant within twenty-four hours of receiving the complaint confirming receipt of the email. The Abuse Point of Contact will preliminarily review to determine whether the complaint reasonably falls within an abusive use as defined by the Abuse Policy. If the complaint does not, the Abuse Point of Contact will email the complainant within forty-eight business hours of the confirmation email to indicate that the subject of the complaint does not fall within the abusive uses as defined by the Abuse Policy, and that CRR considers the matter closed.

If the preliminary review does not resolve the matter, the Abuse Point of Contact will relay the complaint to CRR's Abuse Team.

All requests from law enforcement will be flagged for prompt review by the Internal Abuse Team.

With the resources of Google's registry services team, CRR can meet its obligations under Section 2.8 of the Registry Agreement where required to take reasonable steps to investigate and respond to reports from law enforcement and governmental and quasi-governmental agencies of illegal conduct in connection with the use of its TLD.

In high-priority cases the Internal Abuse Team will seek to determine within forty-eight business hours whether the registration or use of the domain within the TLD is abusive as defined by the Abuse Policy. In all cases, the Internal Abuse Team will determine whether a domain is abusive within seven business days or sooner of receipt of the Complaint. If an abusive use is determined, the Internal Abuse Team may alert the registry services team to immediately suspend resolution of the domain name, as appropriate. Thereafter, if we decide to suspend resolution of the domain name at issue, the Abuse Point of Contact will immediately notify the abusive domain name registrant of such action, the nature of the complaint, and provide the registrant with the option to respond within ten days. All such actions will be ticketed in Google's CRM software to maintain accurate complaint processing records.

If the registrant responds within ten business days, the Internal Abuse Team will review the response to determine if the registration or use is not abusive. If the Internal Abuse Team is satisfied by the registrant's response, the Abuse Point of Contact will submit a request to the registry services team to reactivate the domain name. If the registrant does not respond within ten business days or the Internal Abuse Team is not satisfied by the registrant's response, the Abuse Point of Contact will notify the registry services team to continue the suspension, transfer or cancel the abusive domain name, as appropriate.

The anti-abuse procedure will not prejudice either party's election to pursue another dispute mechanism, such as the Uniform Rapid Suspension System (URS) or Uniform Domain-Name Dispute-Resolution Policy (UDRP). If CRR's registrar receives notice of a URS or UDRP complaint pertaining to a domain name within the TLD, the registrar will ensure that the domain name is locked within

twenty-four hours of receipt of the complaint. The registrar will also notify CRR's Abuse Point of Contact and the registrant.

28.8. Abuse Prevention

In order to further minimize abusive domain name registrations and other activities that have a negative impact on Internet users, CRR will promote the ability to contact a domain registrant using information in WHOIS by providing accessibility in a reliable, consistent, and predictable fashion. CRR will adhere to port 43 WHOIS Service Level Agreements (SLA), which require that port 43 WHOIS service be highly accessible and fast.

~~In order to ensure that only Google and its authorized affiliates are authorized to register and operate domain names within the TLD,~~ CRR will authenticate registrant information by providing an email verification link sent to the registrant to confirm its email address. In addition, we will ensure an ongoing ability to contact the registrant via email by confirming the new email address as part of changes affecting the contact information.

CRR plans to regularly monitor registration data for accuracy and completeness, employing authentication methods, and establishing policies and procedures to address domain names with inaccurate or incomplete WHOIS data. Namely, the WHOIS data will be updated to reflect that the registrant is associated with CRR and/or Google.

As required by Specification 4 of the new gTLD Registry Agreement, CRR will offer thick WHOIS services, in which all authoritative WHOIS data is maintained at the registry. Through CRR's registrar and registry services team, we will maintain timely, unrestricted and public access to accurate and complete WHOIS information, including registrant, technical, billing, and administrative contact information, identity of the registrar, domain name's expiration date, nameservers associated with the domain, and specified fields of data for the Registrant Contact, Administrative Contact, and Technical Contact.

CRR will employ query rate limiting and CAPTCHA procedures for its WHOIS database to minimize abuse of its features.

28.9. Summary and Key Insights

Abusive activity on the Internet has been a growing problem, creating security and stability issues for registrants, registrars and users of the Internet in general. CRR intends to address this issue across its TLDs by dedicating ample resources for the purpose of implementing its strict abuse policies and procedures.

29. Rights Protection Mechanisms

Abusive registrations and uses of domain names in the global top-level domain (gTLD) will not be tolerated. The nature of such abuses creates security and stability issues for the registry, registrars and registrants, as well as for users of the Internet in general. As set forth in prior responses, Charleston Road Registry (CRR) ~~intends to operate this gTLD as a secure and closed registry, and does not plan to offer domain name registrations to third-parties. Charleston Road Registry (CRR)~~ will employ a stringent verification process to establish that every prospective registrant meets the registration criteria. The security of the gTLD is enhanced by the fact that ~~as described in Question 18.b.iv, CRR will limit second level domain names to those names commonly used in trade by registrants in their provision of search functionality only~~ CRR and its affiliates will be eligible to register domains. In addition to ~~this verification process~~ these policies, the registry promises to incorporate the following Rights Protection Mechanisms.

29.1. Rights Protection Mechanisms – Sunrise Period

~~Operation of a closed gTLD with no third-party registrants should mitigate concerns of abusive registrations. Nonetheless,~~ Subject to the Sunrise Eligibility Requirements (SERs) outlined herein, CRR will offer a Sunrise Period of ~~60~~30 days for owners of trademarks listed in the Trademark Clearinghouse to register domain names that contain a second level consisting of an identical match to

their listed trademarks. CRR's registrar will confirm all Sunrise and Registration eligibility. As an added measure of security for brand owners, CRR will staff an internal sunrise team (the "Sunrise Contact") who will review all Sunrise registrations to ensure Sunrise and registration eligibility. The SERs, which will be verified by Clearinghouse data, will include the following: (i) proof of membership in eligible registrant class, namely, employees and/or affiliates of CRR; (ii) ownership of a mark that is (a) nationally or regionally registered and for which proof of use, such as a declaration and a single specimen of current use – was submitted to, and validated by, the Trademark Clearinghouse; or (b) that have been court-validated; or (c) that are specifically protected by a statute or treaty currently in effect and that was in effect on or before 26 June 2008; (iii) representation that all provided information is true and correct; and (iv) provision of data sufficient to document rights in the trademark.

Upon submission of all of the required information and documentation, the registrar will review the submissions and verify the trademark and eligibility information and all contact information provided for registration. The registrar shall then send confirmation messages, listing any deficiencies regarding the trademark information provided with the application. If a registrant does not cure any eligibility deficiencies and/or respond by the means listed within one week, the registrar will release the name. CRR will incorporate a Sunrise Dispute Resolution Policy (SDRP). The SDRP will allow challenges to Sunrise Registrations by third parties for a ten-day period after acceptance of the registration based on the following four grounds: (i) at the time the challenged domain name was registered, the registrant did not hold a trademark registration of national effect (or regional effect) or the trademark had not been court-validated or protected by statute or treaty; (ii) the domain name is not identical to the mark on which the registrant based its Sunrise registration; (iii) the trademark registration on which the registrant based its Sunrise registration is not of national or regional effect or the trademark had not been court-validated or protected by statute or treaty; or (iv) the trademark registration on which the domain name registrant based its Sunrise registration did not issue on or before the effective date of the Registry Agreement and was not applied for on or before ICANN announced the applications received. After receiving a Sunrise Complaint, the Sunrise Contact will review the Complaint to see if the Complaint reasonably asserts a legitimate challenge as defined by the SDRP. If the Complaint does not, the Sunrise Contact will email the complainant within 36 hours of the complaint to indicate that the subject of the complaint does not fall within SDRP, and that CRR considers the matter closed.

If the domain name is not found to have adequately met the SERs, the Sunrise Contact may alert the registrar to immediately suspend resolution of the domain name, as appropriate. Thereafter, the Sunrise Contact will immediately notify the registrant of such action, the nature of the complaint, and provide the registrant with the option to respond within ten days to cure the SER deficiencies or the domain will be canceled. All such actions will be ticketed in Google's customer relationship management (CRM) software to maintain accurate SDRP processing records.

If the registrant responds within ten business days, its response will be reviewed by the Sunrise Contact to determine if the SERs are met. If the Sunrise Contact is satisfied by the registrant's response, it will submit a request by the registry services team to reactivate the domain name. The Sunrise Contact will then notify the Complainant that its complaint was ultimately denied and provide the reasons for the denial. If not, both the registrant and the complainant will be notified that the domain name will be released.

29.2. Rights Protection Mechanisms – Trademark Claims Service

CRR will offer a Trademark Claims Service during the Sunrise Period and plans to continue to offer the service for an indefinite period of time thereafter during general registration. CRR will staff an internal team that will be considered the Trademark Claims Contact. The registrar will verify whether any domain name requested to be registered in the gTLD is an identical match of a trademark that has been filed with the Trademark Clearinghouse. It is anticipated that a domain name will be considered an identical match when the domain name consists of the complete and identical textual elements of the

mark, and includes domain names where (a) spaces contained within a mark that are either replaced by hyphens (and vice versa) or omitted; (b) certain special characters contained within a trademark are spelled out with appropriate words describing it (e.g., @ and &); and (c) punctuation or special characters contained within a mark that are unable to be used in a second-level domain name are either (i) omitted or (ii) replaced by hyphens or underscores.

If the registrar determines that a prospective domain name registration is identical to a mark registered in the Trademark Clearinghouse, the registrar will provide a “Trademark Claims Notice” (“Notice”) in English on the registrar’s website to the prospective registrant of the domain name. The Notice will provide the prospective registrant with access to the Trademark Clearinghouse Database information referenced in the Trademark Claims Notice to enhance its understanding of the Trademark rights being claimed by the trademark holder via a link. The Notice will be provided in real time without cost to the prospective registrant.

After receiving the Notice, the registrar will require the prospective registrant to click a link that specifically warrants that: (i) the prospective registrant has received notification that the mark(s) is included in the Clearinghouse; (ii) the prospective registrant has received and understood the Notice; and (iii) the registration and use of the requested domain name will not infringe on the rights that are the subject of the Notice.

CRR reserves the right to adopt other procedures and requirements for the Trademark Claims Service. At a minimum, it is anticipated that after the effectuation of a registration that is identical to a mark listed in the Trademark Clearinghouse, the registrar will then provide a clear notice to the trademark owner of the trademark with an email detailing the WHOIS information of the registered domain name. The trademark owner then has the option of filing a Complaint under the Uniform Domain Name Dispute Resolution Policy (UDRP) and/or the Uniform Rapid Suspension System (URS) against the domain name. As discussed in its right protection mechanisms, CRR will require in its domain name registration agreements that its registry operator and registrar providers, as well as all registrants, submit to the Uniform Domain Name Dispute Resolution Policy (UDRP) and the Uniform Rapid Suspension System (URS) procedures. CRR and its registrar(s) will abide by decisions rendered under the UDRP and URS on a timely and ongoing basis upon notification.

29.3. Rights Protection Mechanisms – URS

CRR will specify in the Registry Agreement, all Registry-Registrar Agreements, and all Registration Agreements used in connection with the gTLD that it will abide by all decisions made by panels in accordance with the Uniform Rapid Suspension System (URS). CRR’s registrar will be tasked with receiving all URS Complaints and decisions. After receiving a URS complaint about a domain name within the gTLD, the registrar will ensure that the domain name is locked within twenty-four (24) hours of receipt of a URS complaint from the URS Provider and will notify CRR’s Abuse Point of Contact and the registrant. In the event of a determination in favor of the complainant, the registrant will notify the Abuse Point of Contact and the registry services provider to ensure that the registry suspends the domain name in a timely fashion and has the website at that domain name is redirected to an informational web page provided by the URS Provider about the URS throughout the life of its registration. CRR’s Abuse Point of Contact will oversee and monitor the status and resolution of all URS complaints and decisions.

29.4. Rights Protection Mechanisms – UDRP

CRR will specify in the Registry Agreement, all Registry-Registrar Agreements, and all Registration Agreements used in connection with the gTLD, that it will abide by all decisions made by panels in accordance with the Uniform Domain-Name Dispute-Resolution Policy (UDRP). CRR’s registrar will be tasked with receiving all UDRP complaints and decisions. After receiving a UDRP complaint about a domain name within the gTLD, the registrar will ensure that the domain name is locked within twenty-four (24) hours of receipt of a UDRP complaint from the UDRP Provider and will notify CRR’s Abuse Point of Contact and the registrant. In the event of a determination in favor of the complainant,

the registrant will notify the Abuse Point of Contact and the registry services provider to ensure that the registry cancels or transfers the domain name in a timely fashion as provided for by the decision. CRR's Abuse Point of Contact will oversee and monitor the status and resolution of all UDRP complaints and decisions.

29.5. Rights Protection Mechanisms – Proven Registrars

~~CRR will contract with various ICANN-accredited registrars. CRR is committed to reducing abusive registrations, and will ensure that its registrar operates accordingly. intends to utilize its parent company Google Inc. as its registrar, though it reserves the right to contract with other ICANN-accredited registrars in the future.~~

~~CRR is committed to reducing abusive registrations, and will ensure that its registrar operates accordingly.~~

29.6. Rights Protection Mechanisms – Pre-Authorization and Authentication

CRR will authenticate registrant information by providing an email verification link sent to the registrant to confirm its email address. In addition, CRR will ensure proper access to domain functions by requiring multi-factor authentication from registrants to process update, transfer, and deletion requests.

~~No name will resolve until the registrant has been verified by the internal team as an eligible registrant. It is anticipated that only Google and its affiliates will be eligible to register domain names within the gTLD. At no time during the life of the registry will CRR plan to offer domain name registrations to third-parties. CRR will staff an internal team that will pre-approve all registrations made in the gTLD by CRR and/or Google. CRR will thus verify that every prospective registrant is with CRR, Google or another affiliate of CRR.~~

~~In order to ensure that only Google and its authorized affiliates are authorized to register and operate domain names within the gTLD, CRR will authenticate registrant information by providing an email verification link sent to the registrant to confirm its email address. In addition, CRR will ensure proper access to domain functions by requiring multi-factor authentication from registrants to process update, transfer, and deletion requests.~~

~~No name will resolve until the registrant has been verified by the internal team as an eligible registrant.~~

29.7. Rights Protection Mechanisms – Grace Period

See Question 27 for a detailed discussion of CRR's policies with respect to Add Grace Periods.

29.8. Rights Protection Mechanisms – Domain Anti-Abuse Policy

CRR will implement in its internal policies and its Registry-Registrar and Registration agreements that all registered domain names will be subject to a Domain Name Anti-Abuse Policy ("Policy"). See Question 28 for a detailed discussion of CRR's Anti-Abuse Policy.

29.9. Resourcing

Google will implement these technical requirements using the teams and resources discussed below.

The cost of these services will generally be set at reasonable market rates per agreement between CRR and Google. The expected costs are discussed in Questions 46 and 47.

29.9.1. Registry Team

The Registry Team will be responsible for designing and implementing the SRS, EPP, and WHOIS systems, including implementation of the rights protection mechanisms. They will also be responsible for creating tests and monitoring for these systems.

During initial implementation, this team will consist of at least 4-7 software engineers responsible for implementing the project. Additionally, Google plans to staff one software engineer who is responsible for engineering testing and monitoring for the registry, and one software engineer who is responsible for backup, restoration and escrow. In total, Google plans to implement the registry with a team of 6-9 software engineers.

After the registry is complete, Google expects to staff a team to support the ongoing operation of the registry. This team will consist of at least four engineers who will participate in on-call rotation, respond to alerts, provide support to ICANN and registrars for emergency escalations, and maintain responsibility for bug fixes and improvements. This team will continue maintenance throughout the life of the registry.

This team's responsibilities will generally be limited to registry-specific components. The Registry Team will work closely with other relevant teams, including the Authoritative DNS support team, Storage Site Reliability Engineering team, network engineering and operations, and customer support teams. These other teams are described in more detail in Question 31 (Section 31.16), as well as the relevant sections throughout this application.

29.9.2+. Customer Service Team

The Customer Services Team will be responsible for supporting customers and partners, including responding to abusive registrations. Google has a very large existing customer service team of both internal staff as well as staff contracted through third parties, with many hundreds of dedicated staff members already in place. Since these teams and their management are already in place, no standalone implementation resources are needed.

To continue ongoing maintenance of CRR support needs, Google plans to add additional resources for capacity as needed. Google expects to add a total of approximately fifteen additional personnel (including both Google employees and outside vendors) to support all of CRR's customers and partners. The individual staffing allocation to each gTLD is described in Question 47.

29.10. Summary and Key Insights

CRR is committed to implementing strong and integrated intellectual property rights protection mechanisms. Doing so is critical to Google's goals of model Internet citizenship and fostering Internet development, especially in emerging regions. Accordingly, CRR intends to offer a suite of rights protection measures which builds upon ICANN's required policies while fulfilling our commitment to encouraging innovation, competition, and choice on the Internet.