



Via Email

Mr. Cherine Chalaby
Chairman of New gTLD Program Committee
ICANN
12025 Waterfront Drive
Suite 300
Los Angeles, CA 90094-2536

Dear Mr. Chalaby:

As the only community applicant for the extensions : “.LLC”, “.INC”, “.CORP” and “.LLP”, Dot Registry is acutely aware of the necessity for these strings to be operated in a manner that is not only responsible, but reflects the wishes of the community we represent.

As you have read in our response to the Board in regards to the GAC Advice issued in Beijing and will in our response to the Durban Advice, we welcome the GAC Advice as it pertains to our Corporate Identifier Domains. Over the last two years we have worked diligently to build a strong working relationship with the National Association of Secretaries of State (NASS) whose members are globally recognized as the relevant regulatory body for registered businesses in the United States. Through this relationship we have been able to identify potential hazards and concerns associated to the delegation of these extensions and create policies to eliminate those hazards.

As you know from a steady flow of correspondence from the Secretaries of State to ICANN and the GAC, businesses in the US will be clearly impacted by the issuance of Corporate Identifier Domains and NASS has expressed their “collective and clear opinion” that these extensions should be issued as community designations via their recent unanimously passed resolution. See

http://nass.org/index.php?option=com_docman&task=doc_download&gid=1435&Itemid= Further, as a hopeful operator of several TLDs, we too share the stability and security concerns raised by the SSAC, Interisle and various community members and strongly believe, due to the sensitive nature of these TLDs, that there must be appropriate safeguards in place to protect against fraudulent usage of these extensions.

We are aware that a recent study was published in regards to the potential for name space collisions associated to the issuance of “.CORP” as a new gTLD. In addition to supporting the recent NTAG letter to the

Board regarding the Interisle study we believe it is necessary to further emphasize our commitment to resolving these issues in a responsible and efficient manner. **If awarded the “.CORP” extension, Dot Registry will not delegate it until the issues surrounding this TLD are mitigated in a satisfactory manner.** It is our intention to work with ICANN and members of the community to responsibly mitigate any issues associated with the issuance of this extension and create a plan for the secure and safe delegation of this string.

The core of our implementation program relies on a secure and stable introduction of these extensions into the current namespace. We have worked diligently with Secretaries of State and Lieutenant Governors across the US to create policies and implementation guidelines to protect the US Community of Registered Businesses and to ensure the long-term success and security of these extensions. Holding the launch of “.CORP” until issues related to its safe release have been mitigated is seen as essential in order to comply with our business model and implementation plans.

This past June in Brussels, Fadi Chehadé recommitted ICANN to creating a predictable and reliable launch strategy for new gTLDs. However, in the recent applicant update webinar it was brought to our attention that Community Applications could only proceed to the Community Priority Evaluation (CPE) if no GAC advice was pending on their application. While we understand the need for caution in evaluating which applications successfully comply with the GAC advice, this program revision creates an unnecessary delay in the review process, which affects both community applicants and any applications in contention with them.

Applicants in a contention set with non-community applications have had since June of 2012 to settle their contention issues. As you are aware, contention resolution is a lengthy and often financially taxing process. By further delaying the ability for Community Applicants to proceed to CPE you are eliminating many applicant’s rights to pro-actively and effectively handle their contention resolution. Additionally, by the inability of the GAC and the Board to resolve the remaining GAC advice further delays the already skewed launch schedule of these TLDs.

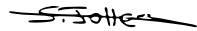
CPEs are new territory and we are unable to determine how lengthy of a process that will be or what set-backs will occur based on community involvement and evaluator outreach. By allowing CPE to begin as scheduled you will be able to keep the process moving forward while the GAC Advice implementation plans are arranged. At the conclusion of the CPE process you could then evaluate whether the applicant possesses the merit to comply with GAC advice. Reserving the right to hold the delegation of strings with pending GAC advice is not only a necessity but responsible. However, prolonging the start of CPE, however is an unnecessary set-back in the program which will only serve to further delay delegation and Applicants’ ability to compete in the market.

We are unable to speak on behalf of other Community Applicants, but are confident that our applications not only comply with, but exceed the GAC standards. Additionally, we believe that in situations such as “.CORP”

which will experience a host of complications prior to delegation it is essential that CPE begin immediately. At this point in the application process it is time to be pro-active in order to not further complicate or delay the launch process. The inability to act or the unnecessary delay of CPE negatively impacts both the applicant community and the gTLD market.

We realize that many of the previous road-blocks could not be anticipated, but we encourage the Board to begin to see the overarching impact of their actions, the affect it has on applicants, and the hurdles that could be avoided by keeping the program on track. It is our fervent wish that our strings, specifically “.CORP” be moved to CPE immediately and that no other applicants experience hardship or delays as a result of the holding pattern currently associated with the adoption of the GAC advice.

Sincerely,



Shaul Jolles, CEO

CC: Dr. Stephen D. Crocker
Akram Atallah
Christine Willet