

7 March 2020

Jennifer Morgan, Executive Director, Greenpeace International  
Kenneth Roth, Executive Director, Human Rights Watch  
Sharan Burrow, General Secretary, International Trade Union Confederation  
Kumi Naidoo, Secretary General (former), Amnesty International  
May Boeve, Executive Director, 350.org  
Patricia Moreira, Managing Director, Transparency International  
Brett Solomon, Executive Director, Access Now  
Anthony Romero, Executive Director, American Civil Liberties Union (ACLU)  
Michael Brune, Executive Director, Sierra Club  
Marta L. Tellado, President & CEO, Consumer Reports  
Rashad Robinson, President, Color Of Change

## **RE: Proposed Change of Control of Public Interest Registry (PIR)**

Dear Jennifer, Kenneth, Sharan, Kumi, May, Patricia, Brett, Anthony, Michael, Marta, and Rashad,

Thank you for your letter dated [21 January 2020](#). We appreciate your interest in the proposed change of control of Public Interest Registry (PIR) from the Internet Society (ISOC) to Ethos Capital. You, like others in our community, have corresponded with ICANN to provide feedback and we understand the concerns being raised.

Since learning of this proposed transaction, ICANN has consistently and repeatedly urged ISOC, PIR, and Ethos Capital to act in an open and transparent manner throughout this process. ICANN has published several announcements and blogs to update the community, along with the related correspondence. ICANN has raised several questions to ISOC and PIR (referenced below). We expect that these responses will provide a better understanding of the proposed structure, which will help us to evaluate the request, and bring additional transparency to questions raised.

For convenience, here are several recent updates:

- **13 February 2020** – Information Requests for ISOC  
(<https://www.icann.org/en/system/files/correspondence/botterman-to-camarillo-13feb20-en.pdf>)
- **19 February 2020** – Information Requests for PIR  
(<https://www.icann.org/en/system/files/correspondence/jeffrey-to-nevett-19feb20-en.pdf>)
- **24 February 2020** – ISOC Response to Information Requests  
(<https://www.icann.org/en/system/files/correspondence/camarillo-to-botterman-24feb20-en.pdf>)
- **4 March 2020** – PIR Response to Information Requests  
(<https://www.icann.org/en/system/files/correspondence/cimbolic-to-jeffrey-04mar20-en.pdf>)

On 30 January 2020, ICANN [announced](#) that the Office of the Attorney General of the State of California (CA-AGO) [requested information](#) from ICANN regarding the proposed transfer in order to "analyze the impact to the nonprofit community, including to ICANN". ICANN is

cooperating fully with the CA-AGO and remains committed to being as transparent as possible in the processing of PIR's request, emphasized by our announcement of the inquiry from the CA-AGO and publication of our correspondence. Our first response to the CA-AGO inquiry is published [here](#).

You may also be aware that Ethos Capital issued a [press release](#) on 21 February 2020, announcing its proposal to the .ORG community to add contractual commitments related to pricing and accountability in the .ORG Registry Agreement. Ethos Capital and PIR are soliciting community feedback through 13 March 2020, via their website, <https://www.keypointsabout.org/public-engagement>. We encourage those interested to communicate their views about the registry operations and/or policies directly to PIR, Ethos Capital, and/or ISOC.

We continue to thoughtfully and thoroughly evaluate the proposed transaction to ensure that .ORG registry remains secure, reliable, and stable. In accordance with the Registry Agreement, ICANN will apply a standard of reasonableness in making its determination on whether to provide or withhold its consent to the request. As of 21 February 2020, PIR has [agreed](#) to extend the deadline for ICANN to respond to 20 March 2020. ICANN appreciates your correspondence. Thank you for your interest and input in this topic.

Sincerely,



Göran Marby  
President and Chief Executive Officer  
Internet Corporation for Assigned Names and Numbers (ICANN)