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Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094
USA

Regensburg, November 13th 2013

**Re: Implementation proposal for GAC Category 1 Safeguard Advice
for "Corporate Identifiers"**

Dear Members of the Board,

InterNetX GmbH, as parent company of the New gTLD applicants

- myLTD GmbH (.LTD) - mySARL GmbH (.SARL)
- myLLC GmbH (.LLC) - mySRL GmbH (.SRL)
- myLLP GmbH (.LLP) - Domain Robot (.LTDA),

wishes to thank the ICANN Board and the New gTLD Program Committee (NGPC) for their tireless work on the many key issues pertaining to the New gTLD Program. We especially recognize the difficulty of your role in balancing the competing interests of applicants with respect to the Governmental Advisory Committee's (GAC) Advice of the Beijing Communiqué.

We noticed that the NGPC recently informed the GAC about their intention to accept its Advice for Category 1. We appreciate the opportunity to comment on this important issue and would like to share some ideas with the aim of speeding the progress of our corporate identifier applications.

We are aware that, according to the GAC, the Category 1 strings require further targeted safeguards. Furthermore, InterNetX fully understands that the TLDs for regulated and professional sectors need to be operated in accordance with all applicable law.



To address the concerns of the GAC, we submitted Public Interest Commitments (PICs) for some of our applications with specific attention to both Eligibility and Acceptable Use Policies. For Eligibility, our PICs require the registrant to affirm that they are an authorized business of the respective legal form in order to be allowed to register a corporate identifier domain. For the Acceptable Use Policy, we specifically obligate the registrant to act in compliance with all applicable law. We also included measures to mitigate violations of these policies. Additionally, we are already in contact with several GAC members, and plan to extend our communication efforts to other relevant interested organizations.

We are confident that our PICs are consistent with the recently published proposal of the NGPC regarding the Beijing GAC Advice. In the event that the NGPC recommendations are accepted, we will incorporate these additional protections into our remaining applications. We suggest this might also be a wise approach for all corporate identifiers.

Separately, we want to reiterate our commitment to open our TLDs to organizations that meet the eligibility requirements, regardless of country. This commitment is consistent with the Rationale for Changes of the current NGPC proposal to the GAC, which holds that discrimination will occur if registrants in some countries are excluded even if they duly meet the legal form requirements in that country. Our commitment is also consistent with the Applicant Guidebook's requirements regarding openness and non-discrimination.

We are troubled with some of the Community applications, which appear at odds with both the Guidebook requirements and the NGPC proposal, as they will exclude otherwise eligible organizations simply based on geographic restrictions. As the aspiring steward of several corporate identifier TLDs, we firmly believe that this type of TLD should only proceed if all eligible organizations are accepted, regardless of country or other discriminatory criterion.

We thank the ICANN Board and the NGPC for considering our request and we are glad to provide any further support necessary to lift the freeze and permit further processing for our applications.

InterNet



Looking forward to receiving your response.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Mörz', written over a light blue horizontal line.

Thomas Mörz
CEO of InterNetX GmbH

CC:

Fadi Chehadé, President and CEO of ICANN
Dr. Stephen D. Crocker, Chair of Board of ICANN
Bruce Tonkin, Vice Chair of Board of ICANN
Heather Dryden, Chair of the GAC
Cherine Chalaby, Chair of the NGPC
Christine Willett, General Manager New gTLD Program
Akram Atallah, President, Generic Domains Division