



August 28, 2015

VIA EMAIL

Mr. Akram Atallah, President, Generic Domains Division (akram.atallah@icann.org)
ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

Re: Country and Territory Name Release

Dear Mr. Atallah:

On behalf of Donuts Inc. and its affiliated registry operators, I write to request approval from ICANN to activate those country and territory names for which the government has “waive[d] its right to authorize the release of the country or territory name.”¹

As stated in Specification 5, Section 4, of the Registry Agreement, registry operators are to withhold country and territory names:

...provided, that the reservation of specific country and territory names (including their IDN variants according to the registry operator IDN registration policy, where applicable) may be released to the extent that Registry Operator reaches agreement with the applicable government(s). (emphasis added).

We appreciate the GAC helping to identify those countries that do not require notification for requests to release country and territory names as second-level domains in new gTLDs.² Through this list, certain governments have consented to the registration or allocation of their name without further notification or review. Effectively, as facilitated by the GAC, we have reached agreement with those governments and are now permitted to release or register such names.

According to Specification 5 of our various registry agreements, however, while ICANN approval is not required to release (register) such names, ICANN approval appears to be required to activate these names in the DNS:

¹ <https://gacweb.icann.org/display/gacweb/Country+and+Territory+Names+as+second-level+domains+in+new+gTLDs+requirements+for+notification+list> See footnote [1]

² <https://gacweb.icann.org/display/gacweb/Country+and+Territory+Names+as+second-level+domains+in+new+gTLDs+requirements+for+notification+list>

Registry Operator must not activate such names in the DNS; provided, that Registry Operator may propose the release of these reservations, subject to review by ICANN's Governmental Advisory Committee and approval by ICANN. (emphasis added).

Please approve the activation of these names forthwith pursuant to the consent of the applicable governments.

Kind regards,



Crystal Ondo
Director, Legal Affairs and Compliance

cc: Mr. John Jeffrey, ICANN General Counsel (john.jeffrey@icann.org)
Ms. Krista Papac, Generic Domains Division (krista.papac@icann.org)
Mr. Jonathon Nevett, Donuts Inc. (jon@donuts.co)