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Cayman Islands

October 30, 2012

ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094

Dr. Steven Crocker  
Mr. Fadi Chehadé  
Mr. Kurt Pritz

Re: Response to Letter from Republican State Leadership Committee and  
Republican National Committee

Dear Dr. Crocker, et al.:

I write on behalf of United TLD Holdco Ltd. (United TLD) in response to a September, 14, 2012 letter addressed to ICANN by the Republican State Leadership Committee (RSLC) and the Republican National Committee (RNC).

In their letter, the RSLC and RNC attempt to argue reasons why ICANN should reject United TLD's application for .REPUBLICAN. Because the RSLC and RNC have applied for .GOP, an arguably competing string, it is easy to see through these arguments and ignore them as nothing more than an attempt to undermine the credibility of United TLD in order to gain a competitive advantage. We feel strongly, however, that at this stage of the evaluation process, facts and the clearly articulated rules and protocols established by ICANN should dictate outcomes. For this reason, please allow me to respond to some of these criticisms and also extend an invitation to the RNC and RSLC to meet and discuss some of their concerns and potential ways we might partner to bring value to those American consumers who identify with the ideals of republicanism.

First, it is important to note (as we made clear in our application) that the label "republican" is not one that can be claimed solely by the Republican political party operating in the United States. There are Republican parties operating in many other countries around the world. Additionally, millions of citizens throughout the world identify themselves as "republicans" without holding membership in any of these Republican parties. Finally, republicanism is a governing concept that stretches back to the ancient Greeks, and far beyond the narrower definition captured by modern political parties themselves. Therefore the RSLC and RNC's argument that United TLD's application should be denied because it would give the impression that it is endorsed by the Republican Party in the United States is not accurate and ICANN's own rules and additional safeguards we

have put in place entirely negate this concern.

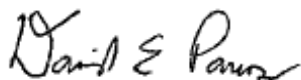
Second, RSLC and RNC's claim that United TLD is not a "reliable source" of information regarding "party news and other information" is completely misplaced. United TLD's application for .REPUBLICAN is an "open" gTLD and therefore United TLD has no intention to become a "source" for any content, including any political information. Instead, it is anticipated that this would be a role assumed by the registrants of .REPUBLICAN and, presumably, .GOP as well. Notwithstanding RSLC and RNC's baseless attack that Demand Media, United TLD's parent company, has a "history of providing, at times, inaccurate information to its users," their argument is irrelevant as it will be registrants and consumers that drive content and sources of information related to republican political activities, and not Demand Media.

Finally, RSLC claims it is a "fitting entity to operate the .GOP," implying that United TLD is not also a fitting applicant. However it is United TLD, *not* the RLSC or the RNC, that has developed eight additional rights and abuse protection mechanisms for its new gTLDs above and beyond those required by ICANN. Additionally, Demand Media, has over 10 years of experience managing domain name operations and addressing issues related to internet security, fraud and abuse. The RLSC and RNC do not have this same experience.

By their own admission, RSCL and RNC agree that ".REPUBLICAN has the potential to be a very powerful gTLD." It is natural then, that they would attempt to discredit United TLD in the hope of eliminating competition for their own string. However, United TLD would espouse an approach that follows the clear rules articulated by ICANN that encourages competition among innovative applicants seeking to provide users with a valuable, useful and safe online experience. It is our aim to reach out to, and engage in conversations with, all applicants that may be our competitors or potential business partners. As such, United TLD would like to invite the RSCL and RNC to meet and discuss some of the concerns expressed in their letter and explore ways in which we can collaborate to create value for political savvy consumers, should we each succeed in being awarded our respective gTLDs. We have copied Mr. Priebus and Mr. Jankowski on this letter and hope they will accept this invitation to meet at their convenience.

We thank ICANN for the opportunity to respond to RSCL and RNC's letter and look forward to answering any questions you, or those two organizations, may have.

Sincerely,

A handwritten signature in black ink that reads "David E Panos". The signature is written in a cursive, slightly slanted style.

David Panos  
Director  
United TLD Holdco, Ltd.

cc: Mr. Reince Priebus, Chairman, RNC  
Mr. J. Christopher Jankowski, President, RSLC