July 8, 2011

VIA EMAIL

Mr. Stephen Crocker
Mr. Rod Beckstrom
Mr. John Jeffrey, Esq.
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601
USA

Re: Undisclosed Change Concerning .JOBS TLD “Purpose” in IANA’s Root Zone Database; Information Request

Dear Messrs. Crocker, Beckstrom and Jeffrey:

The .JOBS Charter Compliance Coalition (the “Coalition”) submits this open letter to you regarding an undisclosed and fundamental change recently made to the designated “purpose” of the .JOBS Top-Level Domain (“TLD”) that is described in the Internet Assigned Numbers Authority’s (“IANA”) Root Zone Database. IANA’s Root Zone Database claims to be the authoritative record regarding the technical and administrative details of the registry operators for various TLDs. As you know, IANA is operated by the Internet Corporation for Assigned Names and Numbers (“ICANN”).

IANA is responsible for maintaining the delegation details of registry operators, including .JOBS operator Employ Media, in the Root Zone Database. Part of the information maintained in the Root Zone Database includes a “Purpose” field, which in the case of sponsored TLDs, describes the limited community that the sponsored TLD is designated to serve. According to the IANA website, “TLD operators can change their delegation details” in the IANA Root Zone Database by submitting a TLD Modification Template. It appears that Employ Media may have recently utilized this process to change the description of the fundamental “purpose” of the .JOBS TLD in the IANA Root Zone Database.

Since the inception of the .JOBS TLD and up until a few weeks ago, the IANA Root Zone Database clearly stated that the limited “purpose” of the .JOBS TLD was “[r]eserved for human resource managers.” (Exhibit A). The Coalition emphasized this language in its open letter to John Jeffrey on May 11, 2011, confirming its position that the .JOBS Charter language clearly limits the class of persons eligible to register a second-level domain name in the .JOBS
TLD to those individuals who work in the human resource function within their respective companies and organizations.

It was therefore surprising – and revealing – when the Coalition discovered that Employ Media apparently made a recent, fundamental and non-transparent change to the “purpose” field of the .JOBS TLD in the IANA Root Zone Database. The “reserved for human resource managers” language that confirmed the restrictive parameters of the .JOBS Charter has been replaced with the following description: “[r]eserved to serve needs of the international human resource community.” (Exhibit B) The expansive language in this change was clearly fabricated after the Coalition’s May 11th letter, which cited the earlier restrictive language in support of its position. Simply put, Employ Media blatantly altered the .JOBS TLD “purpose” description in the IANA Root Zone Database because it directly refuted their position regarding the interpretation of the Charter. This last minute alteration is nothing less than an overt admission by Employ Media that it is in breach of the .JOBS Registry Agreement and Charter and that it must resort to underhanded tactics for support of its position.

The mission statement of IANA states that it is “responsible for the operational aspects of coordinating the Internet’s unique identifiers and maintaining the trust of the community to provide these services in an unbiased, responsible and effective manner.” Consistent with this mission and pursuant to ICANN’s Documentary Information Disclosure Policy (“DIDP”), the Coalition requests the following documents and information:

1. Any and all documents or communications relating to the original “Purpose” field description – i.e., the “[r]eserved for human resource managers” language – for the .JOBS TLD in the IANA Root Zone Database. These documents or communications should include, but are not limited to, the designation template submitted by Employ Media to IANA on June 10, 2005, as described in the “IANA Report on the Delegation of the .JOBS Top-Level Domain” dated August 31, 2005.

2. Any and all documents or communications relating to the change(s) made in the IANA Root Zone Database relating to the “Purpose” field description for the .JOBS TLD.

3. Please provide an explanation or documents regarding the circumstances of the change(s) made in the IANA Root Zone Database relating to the “Purpose” field description for the .JOBS TLD, including but not limited to the following:

   - Which person or entity requested the change;
   - The date the change was requested;
   - The date(s) the change was reviewed and approved by IANA and/or ICANN;
   - The reason(s) given for requesting the change; and
   - The person(s) at IANA and/or ICANN responsible for reviewing and approving the change.
The Coalition requests that (1) ICANN post this letter on the “Correspondence” page of its website and (2) the ICANN Secretary circulate this letter to the members of the ICANN Board of Directors. Thank you in advance for your response.

Sincerely,

John Bell
Chairman, .JOBS Charter Compliance Coalition

cc: ICANN Board of Directors
Maguy Serad
Eric Enson, Esq.
didp@icann.org
EXHIBIT A
LISTS OF TOP-LEVEL DOMAINS
As of August 19, 2010
Source: IANA (www.iana.org)

I.   Generic Top-Level Domains (gTLDs)

.BIZ
   generic-restricted
   Restricted for Business
   Neustar, Inc.

.COM
   generic
   Generic top-level domain
   VeriSign Global Registry Services

.INFO
   generic
   Generic top-level domain
   Affilias Limited

.NAME
   generic-restricted
   Reserved for individuals
   The Global Name Registry Ltd.

.NET
   generic
   Generic top-level domain
   VeriSign Global Registry Services

.ORG
   generic
   Generic top-level domain
   Public Interest Registry (PIR)

.PRO
   generic-restricted
   Restricted to credentialed professionals and related entities
   Registry Services Corporation
   dbs RegistryPro

II.  Sponsored Top-Level Domains

.AERO
   sponsored
   Reserved for members of the air-transport industry
   Societe Internationale de Telecommunications Aeronautique (SITA INC USA)

.ASIA
   sponsored
   Restricted to the Pan-Asia and Asia Pacific community
   DotAsia Organisation Ltd.

.CAT
   sponsored
   Reserved for the Catalan linguistic and cultural community
   Fundacio puntCAT

.COOP
   sponsored
   Reserved for cooperative associations
   DotCooperation LLC

.EDU
   sponsored
   Reserved for post-secondary institutions accredited by an agency on the U.S. Department of
   Education's list of Nationally Recognized Accrediting Agencies
   EDUCAUSE

.GOV
   sponsored
   Reserved exclusively for the United States Government
   General Services Administration
   Attn: QTDC, 2E08 (gov Domain Registration)

.INT
   sponsored
   Used only for registering organizations established by international treaties between
   governments
   Internet Assigned Numbers Authority

.JOBS
   sponsored
   Reserved for human resource managers
   Employ Media LLC

.MIL
   sponsored
   Reserved exclusively for the United States Military
   DoD Network Information Center

.MOBI
   sponsored
   Reserved for consumers and providers of mobile products and services
EXHIBIT B
# Root Zone Database

The Root Zone Database represents the delegation details of top-level domains, including gTLDs such as ".COM", and country-code TLDs such as ".UK". As the manager of the DNS root zone, IANA is responsible for coordinating these delegations in accordance with its policies and procedures.

Much of this data is also available via the WHOIS protocol at whois.iana.org.

<table>
<thead>
<tr>
<th>Domain</th>
<th>Type</th>
<th>Purpose / Sponsoring Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>AC</td>
<td>country-code</td>
<td>Ascension Island (c/o Cable and Wireless (Ascension Island))</td>
</tr>
<tr>
<td>AD</td>
<td>country-code</td>
<td>Andorra (Andorra Telecom)</td>
</tr>
<tr>
<td>AE</td>
<td>country-code</td>
<td>United Arab Emirates (Telecommunication Regulatory Authority (TRA))</td>
</tr>
<tr>
<td>AFRO</td>
<td>sponsored</td>
<td>Reserved for members of the air-transport industry (SITA INC USA)</td>
</tr>
<tr>
<td>AF</td>
<td>country-code</td>
<td>Afghanistan (Ministry of Communications and IT)</td>
</tr>
<tr>
<td>AG</td>
<td>country-code</td>
<td>Antigua and Barbuda (LiHSA School of Medicine)</td>
</tr>
<tr>
<td>AI</td>
<td>country-code</td>
<td>Anguilla (Government of Anguilla)</td>
</tr>
<tr>
<td>AL</td>
<td>country-code</td>
<td>Albania (Electronic and Postal Communications Authority - AKEP)</td>
</tr>
<tr>
<td>AM</td>
<td>country-code</td>
<td>Armenia (Internet Society)</td>
</tr>
<tr>
<td>AN</td>
<td>country-code</td>
<td>Netherlands Antilles (being phased out) (University of The Netherlands Antilles)</td>
</tr>
<tr>
<td>AO</td>
<td>country-code</td>
<td>Angola (Faculdade de Engenharia da Universidade Agostinho Nato)</td>
</tr>
<tr>
<td>AQ</td>
<td>country-code</td>
<td>Antarctica (Malt and Associates)</td>
</tr>
<tr>
<td>AR</td>
<td>country-code</td>
<td>Argentina (Ministerio de Relaciones Exteriores, Comercio Internacional y Culto)</td>
</tr>
<tr>
<td>ARPA</td>
<td>infrastructure</td>
<td>Reserved exclusively to support operationally-critical infrastructural identifier spaces as advised by the Internet Architecture Board</td>
</tr>
<tr>
<td>AS</td>
<td>country-code</td>
<td>American Samoa (AS Domain Registry)</td>
</tr>
<tr>
<td>ASIA</td>
<td>sponsored</td>
<td>Restricted to the Pan-Asia and Asia Pacific community (DotAsia Organisation Ltd.)</td>
</tr>
<tr>
<td>AT</td>
<td>country-code</td>
<td>Austria (NIC AT Internet Verwaltungs und Betriebsgesellschaft m.b.H)</td>
</tr>
<tr>
<td>AU</td>
<td>country-code</td>
<td>Australia (au Domain Administration (auDA))</td>
</tr>
</tbody>
</table>

http://www.iana.org/domains/root/db/
<table>
<thead>
<tr>
<th>Domain</th>
<th>Type</th>
<th>Purpose / Sponsoring Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>.JO</td>
<td>country-code</td>
<td>Jordan National Information Technology Center (NITC)</td>
</tr>
<tr>
<td>.JOBS</td>
<td>sponsored</td>
<td>Reserved to serve needs of the international human resource management community Empry Media LLC</td>
</tr>
<tr>
<td>.JP</td>
<td>country-code</td>
<td>Japan Japan Registry Services Co., Ltd.</td>
</tr>
<tr>
<td>.KE</td>
<td>country-code</td>
<td>Kenya Kenya Network Information Center (KeNIC)</td>
</tr>
<tr>
<td>.KG</td>
<td>country-code</td>
<td>Kyrgyzstan AsiaInfo Telecommunication Enterprise</td>
</tr>
<tr>
<td>.KH</td>
<td>country-code</td>
<td>Cambodia Ministry of Post and Telecommunications</td>
</tr>
<tr>
<td>.KI</td>
<td>country-code</td>
<td>Kiribati Ministry of Communications, Transport, and Tourism Development</td>
</tr>
<tr>
<td>.KM</td>
<td>country-code</td>
<td>Comoros Comores Telecom</td>
</tr>
<tr>
<td>.KN</td>
<td>country-code</td>
<td>Saint Kitts and Nevis Ministry of Finance, Sustainable Development Information &amp; Technology</td>
</tr>
<tr>
<td>.KP</td>
<td>country-code</td>
<td>Korea, Democratic People's Republic of Star Joint Venture Company</td>
</tr>
<tr>
<td>.KR</td>
<td>country-code</td>
<td>Korea, Republic of Korea Internet &amp; Security Agency (KISA)</td>
</tr>
<tr>
<td>.KW</td>
<td>country-code</td>
<td>Kuwait Ministry of Communications</td>
</tr>
<tr>
<td>.KY</td>
<td>country-code</td>
<td>Cayman Islands The Information and Communications Technology Authority</td>
</tr>
<tr>
<td>.KZ</td>
<td>country-code</td>
<td>Kazakhstan Association of IT Companies of Kazakhstan</td>
</tr>
<tr>
<td>.LA</td>
<td>country-code</td>
<td>Lao People's Democratic Republic Lao National Internet Committee (LANIC) Science Technology and Environment Agency</td>
</tr>
<tr>
<td>.LB</td>
<td>country-code</td>
<td>Lebanon American University of Beirut Computing and Networking Services</td>
</tr>
<tr>
<td>.LC</td>
<td>country-code</td>
<td>Saint Lucia University of Puerto Rico</td>
</tr>
<tr>
<td>.LI</td>
<td>country-code</td>
<td>Liechtenstein Hochschule Liechtenstein</td>
</tr>
<tr>
<td>.LK</td>
<td>country-code</td>
<td>Sri Lanka Council for Information Technology LK Domain Registrar</td>
</tr>
<tr>
<td>.LR</td>
<td>country-code</td>
<td>Liberia Data Technology Solutions, Inc.</td>
</tr>
<tr>
<td>.LS</td>
<td>country-code</td>
<td>Lesotho National University of Lesotho</td>
</tr>
<tr>
<td>.LT</td>
<td>country-code</td>
<td>Lithuania Kaunas University of Technology, Information Technology Development Institute</td>
</tr>
<tr>
<td>.LU</td>
<td>country-code</td>
<td>Luxembourg RESTENA</td>
</tr>
<tr>
<td>.LV</td>
<td>country-code</td>
<td>Latvia University of Latvia Institute of Mathematics and Computer Science Department of Network Solutions (DNS)</td>
</tr>
<tr>
<td>.LY</td>
<td>country-code</td>
<td>Libyan Arab Jamahiriya General Post and Telecommunication Company</td>
</tr>
<tr>
<td>.MA</td>
<td>country-code</td>
<td>Morocco Agence Nationale de Réglementation des Télécommunications (ANRT)</td>
</tr>
<tr>
<td>.MC</td>
<td>country-code</td>
<td>Monaco Gouvernement de Monaco Direction des Communications Electroniques</td>
</tr>
</tbody>
</table>