

From: Shaul Jolles
Date: 9/26/2018
To: ICANN Complaints Office
Subject: ICANN the company and/or a department within ICANN

Dot Registry LLC, the .LLP Registry, submitted a change request to the Registry Agreement (RA) on June 6, 2018 (Case # [REDACTED]) and has yet to receive any substantive response from ICANN staff on the approval or rejection of our proposed RA change request. The only thing ICANN staff has done is cancel the original .LLP RA for Specification 12 modifications and reissue a new one.

According to ICANN's change request process, posted at <http://newgtlds.icann.org/en/applicants/global-support/change-requests>, ICANN's standard Service Legal Target ("SLT") is 4-6 weeks for approval of a change request. Dot Registry's change request has sat idle with ICANN for 16 weeks. Dot Registry has not asked ICANN to approve anything that isn't already being utilized by other Registry Operators related to geographic reach and verification/validation methods. As a matter of fact, what Dot Registry has asked to change is and should be considered standard practice amongst Registry Operators. In order for Dot Registry to expand its global reach of the .LLP gTLD, as requested by the European Commission during the application process and which went uncontested by ICANN, we must relax our verification/validation methods in order to not exclude other countries from participating in our gTLD. This is not an unreasonable or complicated request and the delay is unwarranted. We ask for the ICANN Complaints Officer's assistance in this process.

Thank you.