



5 August 2016

VIA EMAIL

ICANN (didp@icann.org)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

Re: *Documentary Information Disclosure Policy Request*

Dear ICANN:

Donuts Inc. hereby requests the release of the agreement(s) between ICANN and Stiftelsen för Internetinfrastruktur (“SE”) for pre-delegation testing (“PDT”) services. This request is made pursuant to ICANN’s Documentary Information Disclosure Policy (“DIDP”).

ICANN charged Donuts \$4,500, as a pass-through cost, to do **pre**-delegation testing of our back-end system before ICANN would approve the transition of a **delegated** and operating TLD to our system. It is worth noting that our back-end system already has gone through PDT nearly 200 times. We also understand why ICANN believes it must conduct PDT for every **new** TLD registry that is not yet operating, but transitioning a **post**-delegated TLD is not addressed in the Applicant Guidebook and ICANN should be able to use its discretion in deciding what testing should be required.

Forcing already operating registries, especially one that already has been heavily tested, to pay for the privilege of undergoing the same exact test as brand new un-delegated registries is not reasonable and creates an anti-competitive situation. We would like to work together with ICANN to address this situation.

It is, therefore, in the interest of transparency and fairness that this agreement be disclosed, so that we may see the relevant terms of the testing agreement and examine what options we, as a community, may have to resolve this issue.

We respectfully ask that you grant this DIDP request.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Alvarez Alvarez", with a long horizontal flourish extending to the right.

Alvarez Alvarez
Senior Vice President, General Counsel and Secretary
Contact Information Redacted

cc: Jonathon Nevett, Donuts Inc. EVP and Co-Founder Contact Information Redacted