ICM Registry LLC Certification Report
September 30, 2011
Pursuant to the .XXX Registry Agreement entered into on March 31, 2011, between ICM Registry, LLC ("Registry Operator") and ICANN (the "Agreement"), the Registry Operator hereby certifies as to Registry Operator’s compliance in all material respects with the terms of the Agreement, including the Appendices.

The Chief Executive Officer certifies the following:

**Registry Operator Contract for Backend Services**

In March 2011 Registry Operator entered into a Registry Services Agreement with Afilias Limited for back-end registry services.

**Registry Operator Compliance with Data Escrow Obligations**

In June 2011 Registry Operator entered into a Registry Data Escrow Agreement with Iron Mountain Intellectual Property Management, Inc. for the provision of Escrow Agent services.

**Registry Operator Access to Registry Services by Registrars**

As of the date of this Certification Report, Registry Operator has contracted with approximately 70 ICANN approved Registrars.

**Registry Operator Compliance with Notifying Registrars how Registry Operator Registry will handle Personal Data**

In June 2011 Registry Operator published its Privacy Policy, see [http://icmregistry.com/policies/privacy-policy](http://icmregistry.com/policies/privacy-policy). The privacy policy sets forth Registry Operator’s terms and conditions with respect to how Registry Operator will handle Personal Data.

**Registry Operator Compliance with Bulk Zone File Access Requests**

Registry Operator has received numerous requests for its Zone File Access and has informed each requesting party that Registry Operator will allow access to its zone files in December 2011; this date corresponds to the date that the Registry Operator Registry System is in production.

**Registry Operator Compliance with Whois Service**

In August 2011 Registry Operator made its Whois services available to the public for its Founder’s names and Registry-reserved names, see [http://icmregistry.com/whois](http://icmregistry.com/whois)
Registry Operator Compliance with Labeling and Monitoring Obligations

In May 2011, Registry Operator’s Sponsoring Organization, The International Foundation for Online Responsibility ("IFFOR"), entered into an agreement with MetaCert, LLC for the provision of content filtering services for domain names in the .XXX sTLD using the W3C “Powder” standard; such services are paid for by IFFOR.

Registry Operator has applied for and been granted membership in the Internet Watch Foundation ("IWF"). Registry Operator is currently evaluating a variety of solutions for reviewing registrant website meta-data to comply with IFFOR policies to prevent child abuse images.

Registry Operator Published Standards and Policies


Registry Operator Compliance with Community Verification and Authentication

In September 2011 Registry Operator launched its Community Membership Application Process, which is described at the informational page [http://icmregistry.com/about/sponsored-community].

Registry Operator Compliance with Outreach Obligations

Since March 2011, Registry Operator has participated in a number of industry tradeshows and meetings in order to provide information about the .XXX sTLD both to potential registrants and to affected stakeholders. For example, Registry Operator had a booth at the May 2011 International Trademark Association (INTA) meeting in San Francisco. Registry Operator also participated in community trade shows, including Venus in Berlin, XBIZ – EU Summit in London, Webmaster Access Europe in Amsterdam, Exxxotica Expo in Miami and Los
Angeles, and the Euro Summit in Prague.

**International Foundation For Online Responsibility ("IFFOR") Developments**

In furtherance of the IFFOR's obligations as the Sponsoring Organization, IFFOR has undertaken the following activities:

a. IFFOR published its Baseline Policies on both the IFFOR website (http://www.iffor.org/docs/appendix-b-baseline-policies-26jul10-en.pdf) and the Registry Operator website (http://icmregistry.com/policies/iffor).

b. In May 2011 IFFOR selected its IFFOR Board of Directors.

c. In May 2011 IFFOR selected its Executive Director.

d. In June and July 2011, IFFOR selected its IFFOR Policy Council.

e. In July 2011 IFFOR and Registry Operator mutually executed the Sponsoring Organization Agreement.

f. On August 26, 2011 IFFOR conducted its first Board of Directors meeting.

g. In September 2011 IFFOR selected its Manager of Public Participation.

h. IFFOR has not yet selected an Ombudsman; as such, IFFOR Ombudsman audits have not been conducted. It is anticipated that an IFFOR Ombudsman will be selected prior to the launch of the .XXX sTLD.

IFFOR's Executive Director has participated in the following stakeholder events: the Family Online Safety Institute ("FOSI") European Conference in London, the XBIZ Summit in Chicago, the Technology Policy Institute in Aspen, the .Nxt Conference in San Francisco, as well as XBIZ – EU Summit in London, Webmaster Access Europe in Amsterdam, and the Euro Summit in Prague. The Executive Director has also met with both the Eros Association (Australian trade association) and AITA (UK’s Adult Industry Association).

**Registry Operator's Registry Reserved Names**

Registry Operator compiled its Registry Reserved names from a variety of sources, including without limitation:

a. Child Protection Services – Registry Operator obtained names and keywords from various child protection organizations; e.g. Association of Sites Advocating Child Protection (ASACP) and the National Center for Missing
Exploited Children (NCMEC).

b. Government Advisory Council – Registry Operator obtained names from participants in the Culturally Significant Names Program, available to all GAC members from 15 May through 31 July 2011. To introduce the program, the Registry Operator sent a letter to Heather Dryden, chair of the GAC, which Ms. Dryden circulated to all GAC Members. Registry Operator received over twelve thousand (12,000) names for its Culturally Significant Names list, of which approximately eighty percent (80%) were so designated. Examples of names that were proposed but not approved by Registry Operator for its Culturally Significant Names list included strings such as nirvana.xxx and kind.xxx.

c. Geographic Designators - Registry Operator compiled its Country Names and Geographic Designators list.

d. IANA/ICANN – Registry Operator complied with its IANA/ICANN domain name reservation obligations.

e. International Organizations – Registry Operator obtained names from various organizations who proactively submitted their names to Registry Operator; e.g., International Olympics Committee and Red Cross.

f. Government Leaders – Registry Operator proactively sought to protect government leaders and independently chose to reserve over one thousand two hundred (1,200) names; e.g. BarackObama and TonyBlair.

g. Non-Adult Industry Celebrities – Registry Operator proactively sought to protect famous personalities and independently chose to reserve thousands of celebrity names; e.g. angelinajolie.xxx.

h. Adult Performer Names – Registry Operator proactively sought to protect adult performer names from being registered by unauthorized parties. Registry Operator is launching its Adult Performer Names Program to ensure that the reserved names are registered by the appropriate person.

i. Premium Generic Names – Registry Operator has reserved a select group of generic words that it intends to allocate under its Premium Generic Names Program.

As a part of its best practices, Registry Operator developed the following methodology in order to maximize the protection sought by the above referenced list sources:
a. String Matching – Registry Operator was advised that people engaged in the illegal distribution of child abuse images utilize a variety of characters for the purposes of evading detection. Registry Operator proactively reserved domain names that attempt to utilize such evading characters; e.g. for the word child, "[]" is often used to replace "D", hyphens "-" are inserted between characters "c-h-i-l-d", "1" is substituted for the letter "i".

b. Short Forms – in certain circumstances Registry Operator captured common abbreviations and short forms; e.g. "& " referenced as "n", "and".

c. Translations – in certain circumstances lists were translated into multiple languages to provide greater protection; e.g. certain names were translated into Spanish, French, and German.

d. DNS Character Translation - many names on the lists utilized characters that are not applicable to domain name strings; e.g., characters such as "." "?" "&" were removed from the Registry Reserved names.

e. Generics - some lists requested by various sources overlapped with names from the Registry’s Premium Generic Names Program and accordingly, were not placed on Registry Reserved status; e.g. "film".

In general, Registry Reserved names will be reserved in perpetuity (throughout the duration of Registry Operator Registry’s agreement with ICANN). However, domain names that are reserved in anticipation of the Premium Generic Names Programs and Adult Performer Names Program will become available for allocation by the Registry Operator.

**Registry Operator Compliance with ICANN Monthly Reporting Obligations**

Since April 2011 Registry Operator has filed monthly reports with ICANN.

**Registry Operator Payments to ICANN**

In July 2011 Registry Operator made its first minimum quarterly payment to ICANN.

**Registry Operator’s Sunrise Period for Non-Sponsored Community Trademark Holders**

On September 7, 2011 Registry Operator launched its Sunrise Period for registered trademark holders, which will run through October 28, 2011. In
keeping with its obligations, Registry Operator established a one-time, cost recovery based fee for reservation of names corresponding to registered trademarks held by individuals and entities that are not members of the sponsored community.

Registry Operator hereby submits this certification, executed by its Chief Executive Officer.

Redacted - Confidential Information