

DEPOSITORY

March 2, 2011

Mr. David A. Olive
Vice President, Policy Development
Internet Corporation of Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292 6601

Re: Submission of Proposed Policy for IP Address Registrar Accreditation

Dear Mr. Olive:

Enclosed herewith, submitted to the Internet Corporation for Assigned Names and Numbers (“ICANN”) Board of Directors, please find two copies of Depository, Inc.’s (“Depository”) proposed policy for the accreditation of registrars for Internet Protocol (“IP”) numbers. As more fully set forth in the accompany letter, also enclosed, we respectfully suggest that special circumstances exist which require the submission of our proposed policy directly to the ICANN Board. A substantial conflict of interest exists whereby the consideration of our proposed policy by the usual ICANN supporting organization would be inappropriate.

For your review and consideration, we therefore submit four documents to facilitate and expedite the review process:

1. Statement of Registrar Accreditation Policy: This is the unedited, unaltered Accreditation Policy for the .com, .org and .net top-level domains which was adopted by the ICANN Board of Directors in 1999. This accreditation policy was thoroughly vetted, approved by the ICANN Board of Directors and has been in use for more than a decade. This accreditation policy serves as the template for Depository’s proposed policy.

2. Statement of Registrar Accreditation Policy (Redline): This is the same document as submission #1, with deletions of specific top-level domain terminology that would not be applicable to IP number registration services. No other requirements for qualification or disqualification were changed. No new terms have been added.
3. Statement of IP Address Registrar Accreditation Policy (Redline): This is the same document as submission #2, with the redline insertion of IP address registrar specific terminology.
4. Statement of IP Address Registrar Accreditation Policy: This is the final proposed policy submitted for ICANN consideration.

These documents are enclosed as hard copies as well as CDs. If you have any questions concerning this submission, please do not hesitate to contact me at (703) 343-6256.

Sincerely,

A handwritten signature in black ink, appearing to read "D. H. Holtzman", with a long horizontal stroke extending to the right.

David Holtzman
President

Encl.

cc.

Mr. John O. Jeffrey, Esq.
General Counsel and Secretary
Internet Corporation of Assigned Names and Numbers

Mr. Frank Fowlie, Ombudsman
Internet Corporation of Assigned Names and Numbers