

Exhibit A

Watne, Kelly M.

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Tuesday, January 14, 2025 5:26 PM
To: Gary Benton
Cc: LeVee, Jeffrey A.; Watne, Kelly M.; David Huebner; Catherine Kessedjian; Tom Simotas
Subject: Re: GCCIX v. ICANN IRP - Motion to Dismiss
Attachments: GCCIX - Court Notice in Arabic.jpg; GCCIX - Court Notice in English.pdf; GCCIX - Resolution in Arabic RCIN6224.pdf; GCCIX - Resolution in English RCIN6224.pdf

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Dear Mr. Benton and IRP Panel,

My client principal is suffering health problems and has been hospitalized recently. Communication in recent weeks has been very sporadic.

I have seen documentation that my client is pursuing necessary audits of its financial reports for the last several years, as a prerequisite to reinstatement. No difficulty is anticipated, but the process takes time. It is not clear that the audits will be complete by end of February, and it appears that GCCIX' corporate status may not be updated by then.

In any event, there is now no doubt that GCCIX' corporate status will be reinstated in due course. To the extent there ever was any question about that, that question has been resolved by the government Resolution which we previously advised about. An English translation of that Resolution is attached, along with the original text in Arabic. E.g.:

Article 20, Paragraph One:

The concerned department may reinstate the registration that was deleted due to non-renewal or cessation of activity in accordance with the provisions of Article 17 of these regulations, based on a request from the registration holder, after collecting the prescribed fees plus the amount of the financial penalty due for each month of delay or part of a month from the date of deletion of the registration.

As for the ongoing court proceeding, it is no longer relevant to this IRP (to the extent it ever was relevant, if at all) since this issue about the ability for GCCIX to reinstate its corporate status is now resolved by government Resolution. Nevertheless, attached is the latest notice from the court in both English and Arabic, indicating that another hearing is set for Jan. 22.

As there is nothing legally questionable about GCCIX' ability to reinstate its corporate status in due course -- long before this IRP will be resolved -- ICANN's unprecedented and dilatory motion should

be denied as moot and/or for many other reasons previously argued. The IRP should be put back on track for expeditious resolution as soon as possible.

Kind regards,
Mike



Mike Rodenbaugh

Rodenbaugh Law LLC

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Thu, Jan 9, 2025 at 9:55 PM Gary Benton <gary@garybentonarbitration.com> wrote:

Dear Counsel,

Mr. LeVee, thank you, received. Counsel, the Tribunal has been addressing this matter. Mr. Rodenbaugh, would you kindly respond to Mr. LeVee's proposal that the Tribunal sets an end of February deadline to await revivor or order dismissal.

Thank you and best regards,

Gary L. Benton, Chair
m: +1.650.283.5949

On Jan 8, 2025, at 6:06 PM, LeVee, Jeffrey A. <jlevee@jonesday.com> wrote:

Members of the Panel:

Please see the attached letter of today's date.

Regards,

Jeff LeVee

Jones Day – Los Angeles

Office: 213.243.2572

From: Gary Benton <gary@garybentonarbitration.com>

Sent: Monday, December 2, 2024 2:49 PM

To: Mike Rodenbaugh <mike@rodenbaugh.com>; LeVee, Jeffrey A. <jleee@jonesday.com>; Watne, Kelly M. <kwatne@jonesday.com>; Lobisser, Kelsey A. <klobisser@jonesday.com>; Crawford, Valrie W. <vcrawford@jonesday.com>

Cc: David Huebner <DHuebner@huebnerarbitration.com>; Catherine Kessedjian Contact Information Redacted

Contact Information Redacted Tom Simotas <simotasat@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Counsel,

Mr. Rodenbaugh, thank you, received. Please notify the Tribunal and counsel promptly, with appropriate proof, if Claimant's corporate status has been reinstated.

Also, thank you for the holiday wishes.

Best regards all,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Date: Wednesday, November 27, 2024 at 2:48 PM

To: Gary Benton <gary@garybentonarbitration.com>

Cc: LeVee, Jeffrey A. <jlevee@jonesday.com>, Watne, Kelly M. <kwatne@jonesday.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford, Valrie W. <vcrawford@jonesday.com>, Tom Simotas <simotasat@adr.org>, David Huebner <DHuebner@huebnerarbitration.com>, Catherine Kessedjian
Contact Information Redacted

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Mr. Benton, Prof. Kessedjian, and Amb. Huebner,

Attached please see a copy of email between GCCIX and the MOIC, confirming that GCCIX corporate status may be reinstated imminently upon payment of fees.

We take issue with several of Mr. LeVee's statements in his last email, particularly as to the scope of the Panel's prior orders and Respondent's compliance therewith. But in any event ICANN's argument is moot now, and its Motion to Dismiss must be denied as such -- if not for the many other reasons previously argued. Fundamentally, ICANN has maintained that GCCIX could not reinstate its corporate status to active, and that is the sole basis for its Motion to Dismiss. That premise is now clearly proved wrong.

We wish those in the US a very happy holiday weekend, and look forward to resumption of the IRP in earnest as soon as possible.

Kind regards,

Mike



Mike Rodenbaugh

Rodenbaugh Law LLC

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Thu, Nov 14, 2024 at 10:55 AM Gary Benton <gary@garybentonarbitration.com> wrote:

Dear Colleagues,

Mr. LeVee, the Tribunal acknowledges receipt of your email below. The Tribunal is considering the motion to dismiss and further briefing from ICANN is not necessary. All, we hope to have a decision soon although prior commitments and holiday schedules may require some delay.

Thank you and best regards,

Gary Benton, Arbitrator

Gary L. Benton, C.Arb, FCIArb, FCollArb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: LeVee, Jeffrey A. <jleee@jonesday.com>

Date: Wednesday, November 13, 2024 at 11:00 AM

To: Gary Benton <gary@garybentonarbitration.com>, Mike Rodenbaugh <mike@rodenbaugh.com>, David Huebner <DHuebner@huebnerarbitration.com>, Catherine Kessedjian Contact Information Redacted

Contact Information Redacted

Cc: Tom Simotas <simotasat@adr.org>, Watne, Kelly M. <kwatne@jonesday.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford, Valrie W. <vcrawford@jonesday.com>

Subject: RE: GCCIX v. ICANN IRP - PO9

I am resending as I have fixed a typo below. Many thanks.

From: LeVee, Jeffrey A. <jleee@jonesday.com>

Sent: Wednesday, November 13, 2024 10:49 AM

To: Gary Benton <gary@garybentonarbitration.com>; Mike Rodenbaugh <mike@rodenbaugh.com>; David Huebner <DHuebner@huebnerarbitration.com>; Catherine Kessedjian Contact Information Redacted
Cc: Tom Simotas <simotasat@adr.org>; Watne, Kelly M. <kwatne@jonesday.com>; Lobisser, Kelsey A. <klobisser@jonesday.com>; Crawford, Valrie W. <vcrawford@jonesday.com>
Subject: RE: GCCIX v. ICANN IRP - PO9

Mr. Chairman and Members of the Panel:

ICANN is reviewing Mr. Rodenbaugh's email below, with the snippet of a third-party article that had been translated by Google, and the alleged amendment cited therein, although GCCIX still has not provided the text of the resolution or a translation.

Importantly, ICANN has reason to believe that GCCIX will not, in fact, be able to renew its commercial registration. And there is no indication that GCCIX has been able to, or has even attempted to, renew its commercial registration since this amendment allegedly went into effect.

Even more egregious, GCCIX continues to refuse to provide information relevant to this issue that the Panel ordered it to produce, in violation of Procedural Order Nos. 8 and 9. GCCIX still has not provided any information regarding why GCCIX's commercial registration was not renewed back in 2018 (or any time in the last six years), the alleged basis for reinstatement that GCCIX is pursuing in the current Bahrain lawsuit, or the basis for the Ministry's refusal to renew the commercial registration.

GCCIX's claim, which ICANN disputes, that it cannot produce the Bahrain pleadings is immaterial and does not prevent GCCIX from providing a summary of the underlying issues and arguments, so that the Panel and ICANN can understand the deficiencies with regard to the commercial registration. Even after years of ICANN requesting such information and the Panel issuing two orders requiring such information be provided, GCCIX still refuses. Such refusal should be viewed as an inference that the missing information would have a negative impact on GCCIX in this IRP if it were to be produced.

GCCIX's continued gamesmanship is completely inappropriate. GCCIX has even refused to provide information regarding the Bahrain Court hearing that took place on 14 October 2024, which was supposed to include closing arguments. Also, GCCIX's claim that there is now "a clear path to prompt reinstatement" is unsupported, given that there are likely various underlying reasons for GCCIX's inability to reinstate its commercial registration, and even a normal renewal requires that an entity provide, among other things, proof that the entity maintains an office space, has employees, maintains audited financial statements, and regularly conducts general meetings. Given GCCIX's disclosure that it has only one employee, among other things, we have strong reason to believe that GCCIX does not qualify in any of these regards. Also, this promise of a "prompt reinstatement" is reminiscent of GCCIX's similar assurance in January 2023, via a letter from GCCIX's Bahrain counsel, that "the company status will be changed to active in 45 days."

In light of this, and for the reasons set forth in ICANN's motion to dismiss, ICANN continues to request that the Panel dismiss this IRP with prejudice. GCCIX's repeated violations of Procedural Order Nos. 8 and 9 and its refusal to provide the information ordered should result in an adverse inference and, in and of itself, warrants dismissal. Moreover, the fact remains that GCCIX initiated this IRP knowing that its commercial registration had already been deleted by law for three years at that time and, to date, the commercial registration remains deleted by law.

If the Panel would like ICANN to provide a further response with regard to the alleged amendment referenced in Mr. Rodenbaugh's email and the reasons supporting dismissal of this IRP, ICANN is more than willing to provide that and can do so within approximately two weeks.

Jeff LeVee

Jones Day – Los Angeles

Office: 213.243.2572

From: Gary Benton <gary@garybentonarbitration.com>

Sent: Thursday, October 31, 2024 9:15 PM

To: Mike Rodenbaugh <mike@rodenbaugh.com>; LeVee, Jeffrey A. <jlevee@jonesday.com>; Watne, Kelly M. <kwatne@jonesday.com>; Lobisser, Kelsey A. <klobisser@jonesday.com>; Crawford, Valrie W.

<vcrawford@jonesday.com>

Cc: David Huebner <DHuebner@huebnerarbitration.com>; Prof. Catherine Kessedjian Contact Information Redacted
Contact Information Redacted; Tom Simotas <simotasat@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Colleagues,

The Tribunal acknowledges receipt of your recent communications below.

Best regards,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Date: Wednesday, October 30, 2024 at 1:09 PM

To: LeVee, Jeffrey A. <jlevee@jonesday.com>

Cc: Gary Benton <gary@garybentonarbitration.com>, Watne, Kelly M. <kwatne@jonesday.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford, Valrie W. <vcrawford@jonesday.com>, David Huebner <DHuebner@huebnerarbitration.com>, Prof. Catherine Kessedjian Contact Information Redacted Tom Simotas <simotasat@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Mr. Benton, Amb. Huebner, and Prof. Kessedjian,

There have been developments, though the situation is still in flux. It appears the MOICT has issued a new regulation which specifically permits companies like GCCIX to pay a maximum fee of 5000 dinar, and have their corporate status reinstated even if more than three years have elapsed.

Here is a [news article](#) discussing this development, particularly the penultimate paragraph, translated by Google:

His Excellency pointed out that Resolution No. 63 includes a fundamental amendment to Article 1 of Resolution No. (129) of 2016 related to financial fines resulting from delaying the renewal of registration in the commercial register, as commercial register owners can now, for the first time, renew their registers even after three years of non-renewal, which was not available previously, adding that the amendment gives register owners an additional opportunity to renew their registers while maintaining the accumulated fines, which range between 10 dinars per month for the first year, 20 dinars per month for the second year, 30 dinars per month for the third year and 500 dinars for each year after the three years, and the fines are calculated only if the commercial register owners wish to reactivate their registers. A ceiling of fines has also been set not to exceed 5,000 Bahraini dinars, which represents an excellent opportunity for register owners to reactivate their registers instead of losing them permanently as was the case in the past.

Therefore, GCCIX now has a clear path to prompt reinstatement. We are seeking the text of Resolution 63 and an English translation, and will forward upon receipt. We also will continue to report any relevant developments from the Bahraini court proceeding.

Meanwhile, it remains entirely inappropriate for this matter to be dismissed per ICANN's unprecedented and outlandish motion.

Kind regards,

Mike

Mike Rodenbaugh

Rodenbaugh Law LLC

email: mike@rodenbaugh.com



phone: +1 (415) 738-8087

On Tue, Oct 29, 2024 at 3:43 PM LeVee, Jeffrey A. <jlevee@jonesday.com> wrote:

Mr. Chairman and Members of the Panel:

We wanted to follow up with the Panel regarding the deadlines set forth in Procedural Order No. 9 and GCCIX's repeated and continued failure to provide information regarding this matter.

According to the order of the Bahraini Court that Mr. Rodenbaugh forwarded via email on 4 October 2024, the Bahraini Court was scheduled to have closing argument on 14 October 2024. On 20 October 2024, I sent Mr. Rodenbaugh an email asking for information regarding what happened at the 14 October hearing and whether there has been a Court order. Mr. Rodenbaugh still has not responded to my email and, to my knowledge, GCCIX has not provided this information to the Panel. In light of this, and echoing the Panel's "concern over an ongoing lack of transparency by [GCCIX] with respect to its corporate status and remediation efforts," ICANN requests that the Panel dismiss this IRP with prejudice when the Panel makes its decision on ICANN's pending motion to dismiss on 31 October, pursuant to Paragraph 8 of Procedural Order No. 9.

Respectfully,

Jeff LeVee

Jones Day – Los Angeles

Office: 213.243.2572

From: Gary Benton <gary@garybentonarbitration.com>

Sent: Saturday, October 5, 2024 12:24 PM

To: Mike Rodenbaugh <mike@rodenbaugh.com>; Watne, Kelly M. <kwatne@jonesday.com>; LeVee, Jeffrey A. <jleee@jonesday.com>; Lobisser, Kelsey A. <klobisser@jonesday.com>; Crawford, Valrie W. <vcrawford@jonesday.com>

Cc: David Huebner <DHuebner@huebnerarbitration.com>; Prof. Catherine KessedjianContact Information Redacted
Contact Information Redacted; Tom Simotas <simotasat@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Counsel,

Mr. Rodenbaugh, thank you, received.

Best regards all,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Date: Friday, October 4, 2024 at 4:39 PM

To: Gary Benton <gary@garybentonarbitration.com>

Cc: Watne, Kelly M. <kwatne@jonesday.com>, LeVee, Jeffrey A. <jlevee@jonesday.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford, Valrie W. <vcrawford@jonesday.com>, Meghan Gleeson <meghan@rodenbaugh.com>, David Huebner <DHuebner@huebnerarbitration.com>, Prof. Catherine Kessedjian Contact Information Redacted Tom Simotas <simotasat@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Mr. Benton and IRP Panel,

Attached please find Claimant's responsive comments and the latest proclamation from the Bahraini court. I should have a translation of that by Monday, though its content is discussed at the end of the attached brief comments.

Kind regards,

Mike



Mike Rodenbaugh

Rodenbaugh Law LLC

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Tue, Oct 1, 2024 at 5:22 PM Gary Benton <gary@garybentonarbitration.com> wrote:

Dear Counsel,

Although I am of the personal view that the briefing on this application has been excessive, the Tribunal will allow your request to submit a further brief on or before Friday. Please do provide detail if there is anything new to be said as to the Ministry claims and any rulings.

Thank you and best regards all,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Date: Tuesday, October 1, 2024 at 1:18 PM

To: Gary Benton <gary@garybentonarbitration.com>

Cc: Watne, Kelly M. <kwatne@jonesday.com>, LeVee, Jeffrey A. <jlevee@jonesday.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford, Valrie W. <vcrawford@jonesday.com>, Meghan Gleeson <meghan@rodenbaugh.com>, Prof. Catherine Kessedjian Contact Information Redacted, David Huebner <DHuebner@huebnerarbitration.com>, Tom Simotas <SimotasAt@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Mr. Benton,

Claimant would like to provide responsive comments to new issues raised by ICANN in its latest submission. Specifically, re the scope of the Panel's prior orders and of ICANN's discovery requests, and to respond to the questions that ICANN raises in this submission. We intend to submit those comments by end of Friday this week, unless instructed otherwise by the Panel.

Kind regards,

Mike



Mike Rodenbaugh

Rodenbaugh Law LLC

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Mon, Sep 30, 2024 at 10:32 PM Gary Benton <gary@garybentonarbitration.com> wrote:

Dear Colleagues,

Ms. Watne, thank you, received. All, the Tribunal will follow up on this as soon as possible.

Best regards,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCIArb, FCollArb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: Watne, Kelly M. <kwatne@jonesday.com>

Date: Thursday, September 26, 2024 at 8:04 PM

To: Gary Benton <gary@garybentonarbitration.com>, Prof. Catherine Kessedjian

Contact Information Redacted

David Huebner

<DHuebner@huebnerarbitration.com>

Cc: Tom Simotas <SimotasAt@adr.org>, LeVee, Jeffrey A. <jleee@jonesday.com>, Mike

Rodenbaugh <mike@rodenbaugh.com>, Lobisser, Kelsey A. <klobisser@jonesday.com>, Crawford,

Valrie W. <vcrawford@jonesday.com>, Meghan Gleeson <meghan@rodenbaugh.com>

Subject: RE: GCCIX v. ICANN IRP - PO9

Dear Mr. Chairman and Members of the Panel,

Attached please find ICANN's Further Response to GCCIX's Supplemental Submission.

Thank you,

Kelly

Kelly Watne

Associate

[JONES DAY® - One Firm WorldwideSM](#)

555 South Flower Street, 50th Floor

Los Angeles, CA 90071

Office +1.213.243.2266

kwatne@jonesday.com

From: Gary Benton <gary@garybentonarbitration.com>

Sent: Thursday, September 12, 2024 7:18 PM

To: LeVee, Jeffrey A. <jleee@jonesday.com>; Mike Rodenbaugh <mike@rodenbaugh.com>;

Lobisser, Kelsey A. <klobisser@jonesday.com>; Crawford, Valrie W. <vcrawford@jonesday.com>;

Meghan Gleeson <meghan@rodenbaugh.com>; Watne, Kelly M. <kwatne@jonesday.com>;

docket@rodenbaugh.com

Cc: Prof. Catherine Kessedjian Contact Information Redacted

David Huebner

<DHuebner@huebnerarbitration.com>; Tom Simotas <SimotasAt@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Colleagues,

On behalf of the Tribunal, I confirm receipt of Claimant's further submission, thank you.

I also confirm receipt of Respondent's email communication below. The Tribunal will allow a responsive submission by Respondent.

Best regards,

Gary Benton, Chair

Gary L. Benton

m: +1.650.283.5949

On Sep 12, 2024, at 3:43 PM, LeVee, Jeffrey A. <jlevee@jonesday.com> wrote:

Mr. Chairman and Members of the Panel:

With the Panel's permission, ICANN would like some time to submit a response to GCCIX's submission, which again fails to provide any information regarding the basis upon which GCCIX is attempting to resurrect its commercial status. I will email the Panel as soon as I can determine how much time is needed to prepare a response, which involves coordination with ICANN's Bahraini counsel. We will certainly plan to get you our response as soon as possible.

Respectfully,

Jeff LeVee

Jones Day – Los Angeles

Office: 213.243.2572

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Sent: Thursday, September 12, 2024 2:05 PM

To: Gary Benton <gary@garybentonarbitration.com>

Cc: Lobisser, Kelsey A. <klobisser@jonesday.com>; LeVee, Jeffrey A. <jleee@jonesday.com>; Crawford, Valrie W. <vcrawford@jonesday.com>; Meghan Gleeson <meghan@rodenbaugh.com>; Watne, Kelly M. <kwatne@jonesday.com>; docket@rodenbaugh.com; Prof. Catherine Kessedjian
Contact Information Redacted David Huebner
<DHuebner@huebnerarbitration.com>; Tom Simotas <SimotasAt@adr.org>

Subject: Re: GCCIX v. ICANN IRP - PO9

Dear Mr. Benton,

Attached please find the Declaration of Abdullah Sayyar, which provides Claimant's response to almost all of the points in PO9.

In particular, Claimant requests the Panel to reconsider its finding in PO9, #5, that Claimant has failed to comply with PO8. Given the additional authority and evidence provided now, it should be clear that Claimant has not intended to violate PO8, and has provided all that it can to date.

This will further address the Panel's last point #8, stating the Panel's intention "to decide ICANN's Motion to Dismiss following receipt of any decision by the Bahraini court received by October 31, 2024." Claimant has no reason to believe the Bahraini court will issue a final decision by that date; indeed, it seems very unlikely at this point.

Claimant continues to maintain that the issue of GCCIX' precise corporate status is not relevant to this IRP, as GCCIX clearly has standing to assert an IRP, and the IRP's purpose is to review ICANN's past conduct, only. It is not relevant what ICANN may or may not do in the future, in response to any conceivable IRP decision. Therefore, Claimant maintains that ICANN's motion should be denied, and the IRP should proceed. If the Panel nonetheless finds GCCIX' precise corporate status to be potentially relevant at this stage of the IRP, then Claimant lamentably submits that the IRP must be suspended until such time as that issue is finally resolved by the Bahraini courts.

Kind regards,

Mike



Mike Rodenaugh

Rodenaugh Law LLC

email: mike@rodenaugh.com

phone: +1 (415) 738-8087

On Fri, Sep 6, 2024 at 4:17 PM Gary Benton <gary@garybentonarbitration.com> wrote:

Dear Colleagues,

Plead find attached the Tribunal's Procedural Order No. 9.

Best regards,

Gary Benton, Chair

For the Tribunal

Gary L. Benton, C.Arb, FCIArb, FCollArb

US and International Arbitrator

Gary Benton Arbitration

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e: gary@garybentonarbitration.com

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This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

<Letter to Panel.GCCIX.Jan.8.pdf>

Exhibit B

Watne, Kelly M.

From: Mike Rodenbaugh <mike@rodenbaugh.com>
Sent: Friday, March 21, 2025 6:04 PM
To: Gary Benton
Cc: LeVee, Jeffrey A.; Watne, Kelly M.; docket@rodenbaugh.com; Catherine Kessedjian; David Huebner; Tom Simotas
Subject: Re: ICDR: GCCIX v. ICANN IRP – Order No. 10 (Motion to Dismiss) / Costs
Attachments: GCCIX_-_El Agemy Declarationpdf.pdf; GCCIX_-_Fahad Declaration.pdf; GCCIX_-_Abdul Declaration.pdf; GCCIX - App for Leave to Reconsider PO 10.pdf; GCCIX_-_Mubarak Declaration.pdf; GCCIX - Anmar Decl and Exhibits final.pdf; GCCIX - Sayyar Decl and Exhs FINAL.pdf

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Report Suspicious

Dear Mr. Benton, Prof. Kessedjian, and Amb. Huebner.

Attached please find Claimant's Application for Leave to file Motion for Reconsideration of Procedural Order #10, along with six supporting Declarations. Thank you for your further consideration of my client's position, and this new and compelling evidence.

Please let me know if you have any questions.

Kind regards,
Mike



Mike Rodenbaugh

Rodenbaugh Law LLC

email: mike@rodenbaugh.com

phone: +1 (415) 738-8087

On Thu, Mar 6, 2025 at 2:20 PM Gary Benton <gary@garybentonarbitration.com> wrote:

Dear Colleagues,

The Tribunal allows Claimant until 21 March 2025 to submit a short application (no more than 5 pages plus any attachments) for leave to file a motion for any requested relief as referenced below. The application should specify the requested relief, the grounds for the requested relief, the likelihood of success, any time/cost savings to be achieved, a proposed briefing schedule, and confirmation that Claimant has made a reasonable effort to meet and confer on the requested relief. Respondent may have a week from the submission of the application to provide a similarly short response.

The Tribunal will address scheduling on costs as may be appropriate thereafter.

Best regards,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: Mike Rodenbaugh <mike@rodenbaugh.com>

Date: Wednesday, March 5, 2025 at 5:43 PM

To: Gary Benton <gary@garybentonarbitration.com>

Cc: LeVee, Jeffrey A. <jleee@jonesday.com>, Watne, Kelly M. <kwatne@jonesday.com>, Catherine Kessedjian Contact Information Redacted David Huebner <DHuebner@huebnerarbitration.com>, Tom Simotas <simotasat@adr.org>, docket@rodenbaugh.com <docket@rodenbaugh.com>

Subject: Re: ICDR: GCCIX v. ICANN IRP - Order No. 10 (Motion to Dismiss) / Costs

Dear Mr. Benton, Ambr. Heubner, and Prof. Kessedjian,

My client's principal was in hospital the week after this Order was issued, and again last week. Also, Ramadan began on Feb. 28. These circumstances have prevented me from having meaningful and regular communications with my client and others about our intended response, in order to confer with Mr. LeVee. Over the past couple of days those communications have intensified and congealed, and so

I made the proposal to Mr. LeVee as soon as I could. He had not mentioned ICANN's briefing proposal nor ICANN's position about a Final Decision until his email that we received this morning. I still need to confer with my client about it, now that ICANN has informed us.

To be sure, we disagree with ICANN about the need for a Final Decision. But in any event, we strongly believe such a decision would be profoundly unjust and premature at this time. We intend to request reconsideration of this Procedural Order, based upon compelling and new circumstances and evidence. As I have arrived in Seattle this afternoon for the ICANN meeting, and my schedule is incredibly full from March 7 to 14 during that meeting, and Ramadan is ongoing, we intend to submit an application which presents the new circumstances and evidence, and requests leave to file a Motion for Reconsideration if necessary, no later than March 21.

We appreciate the Panel's understanding and patience. This is an incredibly important matter for my client, who has invested a great deal of money and effort in the .GCC application to ICANN in 2012, and in the various Bylaws' accountability mechanisms we have pursued since 2013. In all cases, justice requires that litigated matters be decided on their merits, not on procedural technicalities. In ICANN Independent Review Processes, that maxim is much more important, as ICANN has an extremely important public mission, and must be able to be held accountable to its global Community, per its Bylaws. There can be no substantial harm to anyone from allowing this IRP Claimant a short period to try to persuade this IRP Panel that this Procedural Order should be reconsidered in light of new and compelling circumstances.

Kind regards,

Mike



Mike Rodenaugh

Rodenaugh Law LLC

email: mike@rodenaugh.com

phone: +1 (415) 738-8087

On Wed, Mar 5, 2025 at 12:09 PM Gary Benton Contact Information Redacted

wrote:

Dear Counsel,

Mr. LeVee, I confirm receipt of the email below (including the attachment).

The Tribunal will address your proposed schedule and be in touch accordingly.

As to the attachment from Mr. Rodenbaugh, we await communication from him directly. I cannot speak for the Tribunal without consultation, but I anticipate that an application to submit a motion for reconsideration is unlikely to be allowed absent new and compelling circumstances.

Finally, I note the reference to the upcoming ICANN meeting and presume counsel will try to accommodate each other's scheduling during that period.

Thank you and best regards,

Gary Benton, Chair

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

From: LeVee, Jeffrey A. <jlevee@jonesday.com>

Date: Wednesday, March 5, 2025 at 10:42 AM

To: Gary Benton <gary@garybentonarbitration.com>, Mike Rodenbaugh <mike@rodenbaugh.com>, Watne, Kelly M. <kwatne@jonesday.com>

Cc: Catherine Kessedjian Contact Information Redacted David Huebner

<DHuebner@huebnerarbitration.com>, Tom Simotas <simotasat@adr.org>

Subject: RE: ICDR: GCCIX v. ICANN IRP - Order No. 10 (Motion to Dismiss)

Dear Mr. Chairman and Members of the Panel:

Pursuant to paragraph 136 of the Panel's Procedural Order No. 10, ICANN has attempted to meet and confer with GCCIX regarding potential next steps related to the dismissal of the IRP and ICANN's request for costs and fees.

ICANN first contacted GCCIX's counsel via email on 19 February 2025 to schedule a time to meet and confer. GCCIX's counsel responded on 21 February, indicating that he would get back to ICANN early the week of 24 February. He did not. Accordingly, ICANN followed up with GCCIX's counsel two additional times (on 24 and 28 February) and advised that, if GCCIX did not respond, ICANN would contact the Panel separately by 5 March (the deadline set forth in the Panel's Procedural Order No. 10). This morning, at 2:46 a.m. Pacific time, GCCIX's counsel finally responded (see attachment), but he did not meet-and-confer as the Panel instructed in Paragraph 136 of the Procedural Order. Instead, GCCIX's counsel appears to want to challenge Procedural Order No. 10, even though GCCIX never previously indicated an intention to do so and, in all events, such a challenge would be an improper attempt to relitigate matters that have been fully and dispositively resolved by the Panel. ICANN objects to GCCIX's proposal and hereby provides its response to the Panel pursuant to Procedural Order No. 10.

ICANN does not see a need for the Panel to issue any further decision on the merits of the IRP, given the dismissal and supporting analysis set forth in Procedural Order No. 10. ICANN considers the Panel's dismissal of the IRP as the Panel's final written decision and does not believe any further writing is needed in this respect.

ICANN does, however, intend to seek costs and fees incurred in defending this IRP, given that, among other things, GCCIX initiated this IRP even though its corporate registration had been deleted by law for several years, GCCIX failed to comply with certain of the Panel's Procedural Orders and, as the Panel noted, "there has been an ongoing lack of transparency by GCCIX" and its counsel during this IRP. Procedural Order No. 10 at ¶ 99. ICANN appreciates the Panel's comment as to whether ICANN could collect its costs from GCCIX and will address that in its opening brief. ICANN will also address in its opening brief whether it intends to pursue sanctions against GCCIX's counsel.

ICANN therefore requests that the Panel set the following schedule for consideration of ICANN's application for attorneys' fees, expenses, and administrative costs from GCCIX:

- 18 April 2025: ICANN to file cost application, limited to ten pages
- 9 May 2025: GCCIX to file opposition to cost application (if any), limited to ten pages
- 23 May 2025: ICANN to file reply in support of cost application (if any), limited to ten pages

Respectfully,

Jeff LeVee

Jones Day – Los Angeles

Office: 213.243.2572

From: Gary Benton <gary@garybentonarbitration.com>

Sent: Thursday, February 13, 2025 9:00 AM

To: Mike Rodenbaugh <mike@rodenbaugh.com>; LeVee, Jeffrey A. <jleee@jonesday.com>; Watne, Kelly M. <kwatne@jonesday.com>

Cc: Catherine Kessedjian Contact Information Redacted; David Huebner <DHuebner@huebnerarbitration.com>; Tom Simotas <simotasat@adr.org>

Subject: ICDR: GCCIX v. ICANN IRP - Order No. 10 (Motion to Dismiss)

Scheduled Send

Dear Counsel,

Please find attached Order No. 10 (Motion to Dismiss) in the above-referenced matter.

As indicated, the Tribunal requests that you confer and provide views on further procedures and scheduling.

Best regards,

Gary Benton, Chair

For the Tribunal

Gary L. Benton, C.Arb, FCI Arb, FColl Arb

US and International Arbitrator

Gary Benton Arbitration

t: +1.650.283.5949

e: gary@garybentonarbitration.com

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

Exhibit C



New gTLD Application Submitted to ICANN by: GCCIX WLL

String: GCC

Originally Posted: 13 June 2012

Application ID: 1-1936-21010

Applicant Information

1. Full legal name

GCCIX WLL

2. Address of the principal place of business

NBB Tower, Government Avenue
20th Floor
Manama block 316
BH

3. Phone number

+973 1655 7756

4. Fax number

+973 1655 7701

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ICANN New gTLD Application

5. If applicable, website or URL

<http://www.gccix.net>

Primary Contact

6(a). Name

Mr. Fahad Al Shirawi

6(b). Title

CEO

6(c). Address

6(d). Phone Number

+97333310101

6(e). Fax Number

6(f). Email Address

dotgcc@gccix.net

Secondary Contact

7(a). Name

Mr. Mark Dranse

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7(b). Title

Chief Technical Officer

7(c). Address

7(d). Phone Number

+973 3950 8889

7(e). Fax Number

+973 1655 7701

7(f). Email Address

mark@gccix.net

Proof of Legal Establishment

8(a). Legal form of the Applicant

WLL (With Limited Liability, Bahraini LLC)

8(b). State the specific national or other jurisdiction that defines the type of entity identified in 8(a).

Bahrain

8(c). Attach evidence of the applicant's establishment.

Attachments are not displayed on this form.

9(a). If applying company is publicly traded, provide the exchange and symbol.

9(b). If the applying entity is a subsidiary, provide the parent company.

9(c). If the applying entity is a joint venture, list all joint venture partners.

Applicant Background

11(a). Name(s) and position(s) of all directors

Fahad Abdulmonem Mohamed Alshirawi	Chairman
Mazen Abdulelah A.Rahim Alkooheji	Board Member
Omran Abedali Hasan Alaradi	Board Member

11(b). Name(s) and position(s) of all officers and partners

Fahad Abdulmonem Mohamed Alshirawi	CEO and Managing Director
Ijaz Samuel Fiaz	CFO
Mark Dranse	CTO
Mohammed Al Khalifa	Business Development Director

11(c). Name(s) and position(s) of all shareholders holding at least 15% of shares

Fahad Abdulmonem Mohamed Alshirawi	CEO and Managing Director
------------------------------------	---------------------------

11(d). For an applying entity that does not have directors, officers, partners, or shareholders: Name(s) and position(s) of all individuals having legal or executive responsibility

Applied-for gTLD string

13. Provide the applied-for gTLD string. If an IDN, provide the U-label.

GCC

14(a). If an IDN, provide the A-label (beginning with "xn--").

14(b). If an IDN, provide the meaning or restatement of the string in English, that is, a description of the literal meaning of the string in the opinion of the applicant.

14(c). If an IDN, provide the language of the label (in English).

14(c). If an IDN, provide the language of the label (as referenced by ISO-639-1).

14(d). If an IDN, provide the script of the label (in English).

14(d). If an IDN, provide the script of the label (as referenced by ISO 15924).

14(e). If an IDN, list all code points contained in the U-label according to Unicode form.

15(a). If an IDN, Attach IDN Tables for the proposed registry.

Attachments are not displayed on this form.

15(b). Describe the process used for development of the IDN tables submitted, including consultations and sources used.

15(c). List any variant strings to the applied-for gTLD string according to the relevant IDN tables.

16. Describe the applicant's efforts to ensure that there are no known operational or rendering problems concerning the applied-for gTLD string. If such issues are

known, describe steps that will be taken to mitigate these issues in software and other applications.

There are no known issues, specific operational or rendering issues with the applied for string. It is a Latin alphabet based string that conforms to the specifications laid out in RFC 1035.

As with all new TLDs there is the potential for legacy applications to fail to recognize the new TLD string. Some older applications may have hardcoded lists of "valid" TLDs or, worst case, assume anything that isn't ".com", ".net" or ".org" is not valid. There are existing initiatives, including The Public Suffix List operated by the Mozilla Foundation, which we will work with to help educate the broader Internet Community.

17. (OPTIONAL) Provide a representation of the label according to the International Phonetic Alphabet (<http://www.langsci.ucl.ac.uk/ipa/>).

Mission/Purpose

18(a). Describe the mission/purpose of your proposed gTLD.

Model: .GCC is an open Top Level Domain (TLD) created specifically to enhance and develop the provision of Internet services for users in the Gulf and Middle East region.

.GCC will be marketed globally to provide a competitive alternative to existing generic TLDs, regional country code TLDs and to other new TLDs. .GCC will be operated as a commercial for-profit venture with a network of registrars and a low-cost platform for ongoing management.

Mission:

GCCIX intends to position the .GCC TLD as a broadly distributed alternative to .COM, .NET and .BIZ and other widely used TLDs and ccTLDs such as the existing regional ccTLD offerings. Our goal is bring to the region a top-level domain that operates to the highest international standards of registry practices and services. We are committed to providing exemplary functional utility as well as an opportunity for Internet users with a connection to the Gulf and Middle East to secure a domain name in a new, innovative and competitive TLD.

The clearly expressed goal of ICANN is that the Internet should operate as a universal resource, equally accessible and operable by all, irrespective of language, location or culture. It is equally clear that the starting point of the Internet has naturally favored an embedded culture of English usage and preferences.

This round of development is a clear reassertion of ICANN's goals and enables the opportunity to address embedded imbalances to open access for communities of current and potential users. Moreover, ICANN has recognized that the overwhelming dominance of .COM has perpetually advantaged those who had the opportunity for early registration. New communities of users are effectively excluded from the benefits of registration in .COM by the overpopulation of the DNS, and are unable to rebalance their lack of opportunity without preferential access to newly created TLDs that have the potential to be as influential as .COM in their own sphere of interest (whether geographic or topical).

.GCC will create a region-specific new TLD that allows previously excluded and disadvantaged users to take a stake in a meaningful cultural and economic tool that is specifically designed to respond to their linguistic, cultural and specific business needs.

GCC refers generally, but not exclusively, to the Cooperation Council for the Arab States of the Gulf. Formed in May 1981 as a regional organization, it consists of six Gulf countries including Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and United Arab Emirates. Its main objectives are to enhance coordination, integration and inter-connection between its members in different spheres.

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ICANN New gTLD Application

This application is not connected with or sponsored by the Council. .GCC does not purport to represent the Council. However, the term "GCC" has become commonly used to refer generally to the countries and people of the Gulf and Middle East region. It is expected that the general usage and understanding of the region encapsulated by the term "GCC" will continue to grow. The generally accepted broad usage of "GCC" allows for a generic TLD that creates a logical and easily identifiable connection for registrants and Internet users who share common interests in the region, not dissimilar to the development of the European Union which has been served for many years by the .eu domain.

.GCC will:

- * Create a viable, innovative and competitive alternative to existing gTLDs and regional ccTLDs
- * Demarcate a clear identity on the Internet for registrants who see value in establishing a domain under .GCC
- * Significantly enhance existing Internet and TLD services in the region using the Arabic language and script
- * Offer new opportunities for Internet user communities and migrating registrants to secure domain names that are relevant to their activities and (trading) name(s) in a new, innovative, and competitive TLD
- * Establish high level registry and registrar protocols for the benefit of consumers
- * Support stakeholders in the region in beginning to compete globally in an economy increasingly driven by Internet business and communication
- * Comply with all requirements of the laws of the Kingdom of Bahrain & other member states
- * Demonstrate exemplary standards of community commitment and leading corporate social responsibility leadership to the operation of a TLD registry
- * Operate the TLD with respect for cultural sensitivities

Mission in Context:

ICANN has set out a number of goals regarding the introduction of new generic top-level domains (gTLDs). Among the most important of these are the following:

1. The need to maintain the Internet's stability and especially the protection of domain name holders from the effects of registry or registration-system failure.
2. The extent to which approval of the application would lead to an effective proof of concept concerning the expansion of the number of top level domains including:
 - * the diversity the proposed TLD would bring to the top level of the Internet to include fully open top level domains, restricted and chartered domains with limited scope, commercial domains, and personal domains
 - * support of a variety of business models and geographic locations.
3. The enhancement of competition for registration services at the registry and registrar level.
4. The enhancement of the utility of the DNS.
5. The extent to which the proposal would meet previously unmet needs.
6. The importance of appropriate protections of the rights of others, including intellectual property rights in connection with the operation of the TLD, especially during the start-up phases.

Purpose:

The purpose of this TLD is to:

- * Advance the goals of ICANN as set out above
- * Fulfill the TLD's mission as stated above

18(b). How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

i. goal in terms of specialty, service levels, reputation

Definitions:

Registrants: Registrants includes all those who register a domain name in the TLD and who act in accordance with the stated user policies.

Users: Users includes the broader Internet community of users who interact with the TLD.

Others: Others whose interest is relevant to this application includes regulators, policy makers and other public authorities

Specialty experience

The Registry operations team brings considerable specialty experience in the Internet industry both in relation to high-level policy development, launch, operation and management practice in the region and globally. These experiences include managing domain name operations at the UK's first consumer

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ICANN New gTLD Application

ISP, running a globally distributed DNS monitoring platform used by numerous Root Server and TLD registry operators, founding an ISP/telecommunications company and a regional Internet Exchange, and serving as Founding Chairman of the Middle East Network Operators Group (MENOG). In addition, there is experience operating at executive board and management levels within the Regional Internet Registry that serves the Middle East. Significant marketing resources together with registrar partnerships and technical facilities enable the Registry to specialise in the provision of a competitive TLD that is an alternative to existing TLDs.

The Registry's services will be driven by customer focus, liberal policies balanced by cultural sensitivity, technological innovation and channel management expertise.

The cultural backgrounds and participation of the online community are key drivers of the services provided by GCCIX. GCCIX is mindful of the importance of confidence in the operation of the Internet. It is core to the application to be a Registry that is a leading model for Internet stability and security.

Service Levels

In order to advance its mission as stated above, GCCIX has brought together a team with expertise, experience and technical capacity to ensure that the TLD is operated to the best industry standards, in compliance with ICANN's registry contract. The Registry will provide substantial network infrastructure that can guarantee maximum performance and reliability as well as scale seamlessly to meet variations in demand.

Reputation

GCCIX is committed to ensuring that the reputation of .GCC is enhanced by this delegation. The services and operability of .GCC have been designed with the specific policy goals of ICANN in mind. GCCIX believes that its responsibility as a registry extends beyond registrants and users of the Internet. Our credentials as an organization motivated to provide high-level public services are well established. GCCIX was created in August 2011 as the Gulf's first truly independent Internet Exchange Point, entirely free of any carrier or government involvement.

GCCIX has also facilitated the expansion of the CDN and DNS Root Server regional footprint. Our commitment to the development of Internet services in the region rests on the fundamental belief that the Internet must continue as an open resource that advances universal benefits.

Our intention is to support the goals of ICANN and the original concept of the Internet as a universal resource by acting philanthropically and inspirationally in the dedication of our services. We have made significant investment in the above-mentioned developments with neither the expectation nor motivation of profit. The return and value creation we seek is developing the Internet as a tool that will stimulate economic growth, development and benefit to all users. Our participation in the region enables us to understand the historic context, the contemporary needs, and the future potential for the region to flourish as part of the international Internet community. Our application for the .GCC TLD represents a logical extension of our endeavors.

ii.

Context for Competition

Statistical evidence demonstrates the continued expansion of Internet registrations. The number of domains in the current generic TLD space (for example.COM, .NET, .ORG, .INFO, .BIZ and . US) is in excess of 135 million (see <http://www.whois.sc/internet-statistics>) and there are over 215 million registered domain names in all TLDs. In the second quarter of 2011 more than five million domain names were added to the Internet, marking a growth rate of 2.5% over the first quarter.

The .COM and .NET TLDs experienced aggregate growth, surpassing a combined total of 110 million names in the second quarter of 2011, representing a 1.8 percent increase in the base over the first quarter of 2011 and an 8.3 percent increase over the same quarter in 2010. In the same period, 2.9 million ccTLD domain names were added, bringing total ccTLD registrations to approximately 84.6 million. This is an increase of approximately 6.6 million domain names, or 8.4 percent from a year ago.

The enthusiastic take-up rate is evidence of the positive impact of increased TLD opportunities. While .COM will continue for some time to be dominant in the domain name market, there is clear evidence that consumers seek TLD innovation and differentiation.

In particular, the following issues arise in the current environment:

- * challenges for registrants to secure a unique and appropriate name within a heavily populated gTLD space
- * challenges for users to locate authentic sources of information
- * cybersquatting and entrenched inactive ownership of domain names

Competition

Research indicates that, in contrast to the global context described above, the GCC regional ccTLD market has had slow growth, and for the most part, this is due to a lack of competition, high prices, restrictive policies, manual processing of applications and long delegation delays.

With 40 million inhabitants, the region has an estimated combined total of just 200,000 registrations across six country codes, five of which require proof of a local presence to register a domain name. Registration times are much longer than in registries that use standard EPP systems. This is largely true because of manual processes in place that mandate the manual verification of presence requirements. Registration fees in these regionally focused domains are multiple times that of broadly available TLDs. Unsurprisingly, many registrants prefer to use the established gTLDs even though this means settling for a less appropriate name.

.GCC represents a strong competitive alternative to existing regional ccTLDs by providing instant registration and delegation under the most liberal framework permitted by law, within a TLD which has local significance. The advantage over generic TLDs is that .GCC will provide more 'first choice' labels while respecting important local cultural considerations. We believe that introducing such competition will stimulate other TLDs within the region.

.GCC will be a valuable digital asset dedicated residents living and working in the region. Registrants will have the opportunity to create and control an online identity reflective of their culture and society and with the potential to help fuel greater Internet use across the region. GCCIX's proposal is founded on the belief that competition in the marketplace makes for stronger, more innovative and more creative alternatives for the consumer.

Like other actions that remove artificial barriers to entry, the likely effect of the expansion of this TLD is to increase innovation and lower prices over the longer term. GCCIX has allocated appropriate funding to ensure the long-term viability and stability of its proposed registry. We believe that standards and services in the technical solution are paramount for delivering optimal service.

Differentiation

The differentiation of this registry from existing market offerings is key to competition. .GCC is explicitly by:

- * A unique and meaningful three letter string
 - * The most liberal policies of any TLD in the region whilst maintaining respect for cultural sensitivities
 - * Preferential opportunities for registration, described launch policies below
 - * The opportunity to self-select a regional affiliation that reaches past jurisdictional boundaries.
- Previously, entities in the area were caught between narrow ccTLD presence requirements on one side and an undifferentiated global registration pool in the gTLD marketplace on the other. GCCIX has a rich understanding of the needs of the global and local Internet community and is committed to building a domain name system that grows with and responds to the needs for services, products and information sought by the local community. A steady, secure and responsive service that offers users a competitively priced and distinctive service will enable the TLD to operate as a genuine and enduring alternative to existing TLDs.

Future opportunities for differentiation

GCCIX is committed to providing IDN support at the second level in the future, once registry operations are stable. Whereas the primary language of the region is Arabic, half of the registries serving the region only permit registrations using ASCII characters. GCCIX believe that it is fundamentally important to support Arabic script if .GCC is to succeed. We observe that there are significant number of groups within the GCC region that use other non-roman, non-Arabic scripts (for example the Indian and Filipino communities). We will gauge community demand with respect to supporting additional character sets.

Innovation

GCCIX believes that in a vital public and business service such as the Internet, innovation must be founded on the critical requirements of DNS stability & security.

Policies for the .GCC registry have been developed to extend and enhance existing procedures in an incremental and cooperative manner.

iii.

We aim to ensure that the user experience achieves the following outcomes:

- a) Customer Service: rapid, responsive and reliable customer service using leading technology supporting the registrant from registration onward
- b) Accessibility: preferential registration opportunities to support policies of regional access to a new attractive TLD
- c) Robust neutrality, data security and privacy
- d) Robust data escrow
- e) Internet standards regarding naming and reserved names
- f) Liberal, yet culturally sensitive standards of acceptable-use policy and registrar agreements
- g) Leading protocols on Technology, Anti- Cybersquatting and WHOIS.

iv.

GCCIX has developed the following explicit policies to support the user-experience goals enunciated in above.

(a) Customer service

There is strong evidence that Internet registration and usage grows where service quality is enhanced. One regional ccTLD adopted EPP and rapidly represented approximately 45% (approximately 90,000 of 200,000) of the regional non-generic registrations. Unfortunately, this benefit was only available to users of that ccTLD. The untapped potential in the region of the Internet as an accessible resource for business and communication will be addressed by the introduction of the .GCC TLD.

The development of a clear channel to market for new second level registrations is critical to the success of any TLD. Strong cooperative relationships with local registrars will be forged.. GCCIX has committed funding, focused management of TLD programs across registrars, and registrar participation in program management.

(b) Accessibility

In order to compete with existing generic TLDs, .GCC will offer unrestricted access to registrants subject to comprehensive ICANN approved privacy and trademark protections. Our sunrise and landrush policies will enable early opportunities for entities in the region to secure their preferred domain name in the .GCC space.

GCCIX is committed to the operation and development of an outstanding registry that expands the accessibility and function of the Internet to new communities. A commitment to leading Internet corporate citizenship remains a critical element of the financial and policy platform.

GCCIX has focused particularly on policies and procedures that enhance the external benefits of .GCC. More particularly the facilitation of trademark protection both before and after domain name registration, sunrise service, trademark claims service and opportunities for entry after landrush.

We believe that an immediate benefit to the Internet community is the open access to a new gTLD that will relieve name scarcity and offer new and fair opportunities to acquire domain names. As new Internet communities are established, the issue of name scarcity becomes both more pressing and emphasizes the entry disadvantages to new registrants. The "level playing field" created by .GCC enables users to establish a meaningful Internet presence with a registry that is committed to strong marketing strategies to support the value, trust, and credibility of the TLD name.

(c) Robust Neutrality

The Registry will be operated on best industry and ICANN practices to ensure that it is a trusted, unbiased provider of core Internet DNS functionality while providing consistent and stable operation of a new TLD.

(d) Robust Data Security & Privacy

The Registry, as a neutral and trusted registry, must maintain the trust of the registrars and the consumers. Therefore, the Registry will not market in any way the registrant information obtained from registrars for purposes of running the registry nor will it share that data with any unrelated third parties.

The Registry will provide registrars with a mechanism for accessing and correcting personal data and will take reasonable steps to protect personal data from loss, misuse, unauthorized disclosure, alteration or destruction.

In addition, as part of the Registrar Code of Conduct, registrars will be required to abide by all applicable international, national, and local laws regarding data privacy and information collection.

(e) Robust Data Escrow: The Registry will follow all data escrow requirements mandated by ICANN and work with an ICANN accredited Data Escrow provider.

(f) Internet Standards Regarding Naming & Reserved Names

The Registry will reserve and block the registration of names as specified in Schedule 5 of the Registry Agreement. The Registry will reserve for itself a small number of names necessary for the secure operational and technical functions of the registry.

(g) Acceptable Use Policy and Registrar Agreements

The policy of the Registry and contracted registrars relating to the computer systems, hardware, servers, bandwidth, telecommunications transport and e-mail routing provided by the Registry and Domain Provider(s) will promote the integrity, security, reliability and privacy of the Registry Network and the Registrar(s).

The Registry's policy will follow leading industry standards that support the free flow of information over the Internet and inhibit the transmission of materials that offend relevant laws, rights, interests and codes of conduct. The policy will provide a complaints procedure and enforcement mechanisms.

The Registry and Domain Provider(s) and/or the Registrar may at its sole discretion remove any content or material or services such as URL forwarding, Email forwarding, DNS hosting, WHOIS protection and proxy privacy services from its servers, or terminate access to the Registry Network where it has been determined by the Registry and Domain Provider(s) and/or the Registrar that a registrant has violated the Acceptable Use Policy.

(h) Leading Protocols on Technology, Anti-Cybersquatting & WHOIS

The Registry will adhere to all existing ICANN policies as well as commit to further evolution of TLD policies that advance ICANN's core principles in the operation of the Internet. While this round of applications for new TLDs may revolutionize the Internet, the Registry believes that such revolution be supported by evolutionary development of operational rules. The Registry is committed to a full and cooperative partnership with ICANN in the growth of Internet services on a secure and sustained basis through, for example, Generic Names Supporting Organisation policy development processes.

v.

GCCIX recognizes the importance of balancing individual privacy rights with the rights of intellectual property owners, law enforcement and other interested third parties who have access to WHOIS data for legitimate uses. Comprehensive privacy and authentication rules are built into the operation of .GCC consistent with requirements under the Registry Agreement.

As privacy and confidentiality of personal information are key elements in the provision of a positive user experience, the Registry will take all reasonable steps to protect personal data from loss, misuse, unauthorized disclosure, alteration or destruction. The Registry will also comply, in accordance with the Registry Agreement, with all existing and future consensus policies as formally adopted by ICANN.

The Registry will operate a WHOIS service in accordance with Specification 4 of the Registry Agreement, in full compliance with applicable privacy laws or policies. The Registry will also implement appropriate measures to avoid abuse of WHOIS in order that access is restricted to legitimate authorized users. As the Registry will only use ICANN-accredited registrars, the registrars will be required to implement the data privacy policies as defined in the Registrar Accreditation Agreement.

vi. Describe whether and in what ways outreach and communications will help to achieve your projected benefits

Context for Projected Benefits

It is clear from historic data relating both to registrations in.COM and other generic TLDs, as well as industry specific and country-code registrations, that the demand for unrestricted domain names has grown exponentially. The number of registrations in the.COM TLD far outstrips all of the other TLDs. There are no indications that there will be any slowing of this trend and demand is expected to continue to grow as the needs of new generations of Internet users evolve.

Registrant / User Outreach and Communication

GCCIX will communicate to users through wide public and industry channels. While accurate predictions of the initial volume of registration requests can only be speculative, GCCIX will ensure that it is able to provide contingencies for the case where demand greatly exceeds predictions. Through its appointed marketing partners, the Registry will market and brand.GCC in the target region and worldwide. Through these marketing efforts, the Registry acts to fulfill ICANN's mission to enhance the functionality and usability of the Internet on a global basis.

Registrar Outreach and Communication

The Registry will undertake a pro-active educational campaign with registrars to quantify the opportunity for Internet end-users. This will involve a systematic information drive and personal contact from the registry customer support staff and account managers.

Registry Outreach and Communication

The Registry will allocate resources to fund and support collaboration, knowledge sharing, and adoption of best practices among all TLD operators in the GCC region.

User Outreach and Communication

GCCIX will actively seek opportunities to promote awareness of and activities to combat issues such as online threats, phishing and cybercrime. These opportunities may be pursued as annual awards, educational initiatives at all levels of the Internet's user population including at educational establishments, and participation in conferences, and other similar activities.

18(c). What operating rules will you adopt to eliminate or minimize social costs?

i. resolving competing applications

Policy Context

The Registry is committed to the broad policy goals expressed by ICANN in the evolution of this round of expansion of TLDs. Consistent with those policies, it is committed to providing a scalable, comprehensive and stable addition to the DNS.

Registry choice and consumers

A key consumer benefit will flow from the right selection of Registrars. The Registry will select ICANN-accredited registrar(s) that wish to enter into an agreement to register domain names in the TLD. As part of the selection process, the Registry will evaluate each registrar on a case-by-case basis, weighing the following characteristics:

- Thorough understanding of the principles and intentions underlying the registration policies;
- Geographic and language diversity reflecting the diversity of the region
- Dedicated willingness and ability to propagate and enforce specifications or policies in an observant and diligent manner and in accordance with policies and procedures prescribed by Registry Operator;
- Demonstrated willingness and ability to publicize and market .GCC, and to use .GCC marketing materials as appropriate;
- Demonstration that sufficient staff resources are available and that the ability to interface with automated and manual elements of the TLD registry process is inbuilt;
- Demonstrated systems designed to avoid submission of clearly inappropriate applicants and
- Demonstrated systems designed to avoid any disputes regarding transfers among registrars.

In order to ensure a fair and open opportunity to enter into a registry/registrar agreement, the Registry will review and revise our selection of registrars and registrar criteria from time to time.

Competing Applications and Intellectual Property Protection - Sunrise

In relation to contention that involve intellectual property, The Registry will minimise costs to consumers in protecting their intellectual property through the following mechanisms:

- (i) implementation of the Schedule of Reserved Names set out in Specification 5 of the Registry Agreement
- (ii) implementation and adherence to rights protection mechanisms that may be mandated from time to time by ICANN, including all mechanisms mandated in Specification 7 of the Registry Agreement
- (iii) implementation in accordance with the requirements established by ICANN of each of the mandatory rights protection mechanisms set forth in the Trademark Clearinghouse

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- (iv) compliance with ICANN rules on dispute resolution mechanism as they may be revised from time to time, including the Trademark Post-Delegation Dispute Resolution Procedure (PDDRP) and the Registration Restriction Dispute Resolution Procedure (RRDRP) when the final procedure is adopted
- (v) compliance with the Uniform Rapid Suspension system (URS)
- (vi) Sunrise registration services in accordance with the Registry Agreement. The Sunrise period will be in place for at least a 30 day period to allow eligible rights holders to register names in the TLD. A Sunrise A will be for eligible trademarks compliant with the Registry Policy. Sunrise B will be used for all other eligible trademarks. Clear rules for the Sunrise policy and processes will be published well ahead of Registry launch. There will be a Sunrise Dispute Resolution Policy.
- (vii) A Notification service to trade mark owners who have registered in the Trademark Clearinghouse that someone else is applying for a Sunrise registration for an exact match.
- (viii) A Trademark Claims service (for at least 60 days) to provide notice to potential registrants of existing trademark rights that are registered in the Trademark Clearinghouse (that is, a warning to not register a name that might infringe).

Competing Applications - Landrush and General Availability

GCCIX is dedicated to ensuring a fair opportunity for all users to register a domain name to which they are legally entitled.

- (i) The Sunrise policy focuses on fulfilling the objectives of the Registry and is described in the answer to question 29.
- (ii) Following the Sunrise period the Registry will operate a Landrush to allocate premium names.
- (iii) At the close of Landrush, General Availability will start. This will be on a first-come first-served model.
- (iv) Expired names: The Registry believes that all domain name registrants should be on an equal footing in terms of securing an expired domain name. For this reason the registry will establish reasonable policies and take practical actions to discourage the acquisition of expiring domain names by secondary market aggregators for auction, arbitrage or other re-sale that reduces available domains at the normal market price.
- (v) Speculative registrations: The .GCC namespace is intended to be a current and relevant group of registrations that is active and not stifled by speculative or abusive registrations. GCCIX will establish reasonable policies and take practical actions to discourage speculative and unused registration of domains.

Full details of the Sunrise and Landrush policies and processes will be made available in due course.

- ii. Explain any cost benefits for registrants you intend to implement (eg advantageous pricing, introductory discounts, bulk registration discounts)

GCCIX is committed to a pricing policy that advances its mission. Consistent with this policy, the Registry will implement the following.

Billing and Collection Procedures

The Registry's billing and collections procedures will be consistent with existing industry procedures. All payments for new TLD registrations will be on an upfront payment basis. No registration will be completed until the registry receives payment. Because registry services to the registrant will be provided through the registrars, all billing and collections policy matters with respect to the registrant will be the responsibility of the registrars.

Registration Prices

Registration prices will be at the discretion of individual accredited registrars. It will be in the interests of Registrars to price registration competitively and offer attractive additional services in order to maximize the number of registrations they secure.

The Registry will set a fixed price to the Registrar for each domain name registration per year.

Registrars will be required to register each domain name for a period of one to ten years.

Registrars will be required to remit a registration to the Registry for the exact period of the Registry-Registrant agreement.

For domain name renewal fees, the Registry will similarly charge a fixed price to Registrars for each renewal year.

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The Registry has chosen a flat annual registration and renewal fee structure so that it reduces costs to the Internet user community.

The Registry will consistently support the investigation and adoption of new and approved technologies that contribute to the stability and robustness of the Internet (e.g. DNSSEC, IPv6, etc) at the appropriate times. Further, GCCIX will investigate the use of incentives at the Registrar and Registrant levels to encourage the use of these consensus best practices.

iii. price increase policy?

Price increase policy

In conformity with the Registry Agreement, the Registry will provide advance written notice to Registrars of price increases. GCCIX is mindful of the diverse stakeholder input during the development of the New gTLD Registry Agreement. Consistent with support of ICANN's policy on the expansion of the DNS, it will give full consideration to the enduring diverse and communal interests if and when price escalation is initiated. While the Registry does not plan to execute a contractual agreement with Registrars relating to price increase or escalation, it will only make such increases in line with equitable and non-discriminatory policies.

The Registry commits not to increase prices during the first three years of operation.

The Registry commits not to increase prices more than once in any 12 month period.

The Registry commits to honour the price paid for multi-year registrations in the event that prices are increased during the initial term. Renewals and extensions will always be processed at the prevailing prices.

Community-based Designation

19. Is the application for a community-based TLD?

No

20(a). Provide the name and full description of the community that the applicant is committing to serve.

20(b). Explain the applicant's relationship to the community identified in 20(a).

20(c). Provide a description of the community-based purpose of the applied-for gTLD.

20(d). Explain the relationship between the applied-for gTLD string and the community identified in 20(a).

20(e). Provide a description of the applicant's intended registration policies in support of the community-based purpose of the applied-for gTLD.

20(f). Attach any written endorsements from institutions/groups representative of the community identified in 20(a).

Attachments are not displayed on this form.

Geographic Names

21(a). Is the application for a geographic name?

No

Protection of Geographic Names

22. Describe proposed measures for protection of geographic names at the second and other levels in the applied-for gTLD.

(Note Specification 5 of Registry Agreement)

The Registry is cognizant of the GAC advice in their management of second level domain name registrations as well as Specification 5 of the Registry Agreement.

Specification 5 of the New gTLD Registry Agreement initially reserves at the 2nd and all other levels within the TLD:

- * Country and territory names contained on the ISO 3166-1 list
- * UN Group of Experts on Geographical Names, Technical Reference Manual for the Standardisation of Geographical Names, Part II Names of Countries of the World, and
- * The list of UN member states in 6 official UN languages prepared by the Working Group on Country Names of the UN Conference on the Standardization of Geographical Names

In accordance with the provisions contained in Specification 5, such names may be released if the Registry Operator reaches agreement with the applicable government and/or the Registry Operator proposes release of the reserved name(s) subject to review by GAC and subsequent approval by ICANN.

Registry Services

23. Provide name and full description of all the Registry Services to be provided.

Throughout the technical portion (#23 - #44) of this application, answers are provided directly from Afiliias, the back-end provider of registry services for this TLD. The Applicant chose Afiliias as its back-end provider because Afiliias has more experience successfully applying to ICANN and launching new TLDs than any other provider. Afiliias is the ICANN-contracted the registry operator of the .INFO and .MOBI TLDs, and Afiliias is the back-end registry services provider for other ICANN TLDs including .ORG, .ASIA, .AERO, and .XXX.

Registry services for this TLD will be performed by Afiliias in the same responsible manner used to support 16 top level domains today. Afiliias supports more ICANN-contracted TLDs (6) than any other provider currently. Afiliias' primary corporate mission is to deliver secure, stable and reliable registry services. This TLD will utilize an existing, proven team and platform for registry services with:

- A stable and secure, state-of-the-art, EPP-based SRS with ample storage capacity, data security provisions and scalability that is proven with registrars who account for over 95% of all gTLD domain name registration activity (over 375 registrars);
- A reliable, 100% available DNS service (zone file generation, publication and dissemination) tested to withstand severe DDoS attacks and dramatic growth in Internet use;
- A WHOIS service that is flexible and standards compliant, with search capabilities to address both registrar and end-user needs; includes consideration for evolving standards, such as RESTful, or draft-kucherawy-wierds;
- Experience introducing IDNs in the following languages: German (DE), Spanish (ES), Polish (PL), Swedish (SV), Danish (DA), Hungarian (HU), Icelandic (IS), Latvian (LV), Lithuanian (LT), Korean (KO), Simplified and Traditional Chinese (CN), Devanagari (HI-DEVA), Russian (RU), Belarusian (BE), Ukrainian (UK), Bosnian (BS), Serbian (SR), Macedonian (MK) and Bulgarian (BG) across the TLDs it serves;
- A registry platform that is both IPv6 and DNSSEC enabled;
- An experienced, respected team of professionals active in standards development of innovative services such as DNSSEC and IDN support;
- Methods to limit domain abuse, remove outdated and inaccurate data, and ensure the integrity of the SRS, and;
- Customer support and reporting capabilities to meet financial and administrative needs, e.g., 24x7 call center support, integration support, billing, and daily, weekly, and monthly reporting.

Afiliias will support this TLD in accordance with the specific policies and procedures of The Applicant (the "registry operator"), leveraging a proven registry infrastructure that is fully operational, staffed with professionals, massively provisioned, and immediately ready to launch and maintain this TLD.

The below response includes a description of the registry services to be provided for this TLD, additional services provided to support registry operations, and an overview of Afiliias' approach to registry management.

Registry services to be provided

To support this TLD, The Applicant and Afiliias will offer the following registry services, all in accordance with relevant technical standards and policies:

- Receipt of data from registrars concerning registration for domain names and nameservers, and provision to registrars of status information relating to the EPP-based domain services for registration, queries, updates, transfers, renewals, and other domain management functions. Please see our responses to questions #24, #25, and #27 for full details, which we request be incorporated here by reference.
- Operation of the registry DNS servers: The Afiliias DNS system, run and managed by Afiliias, is a massively provisioned DNS infrastructure that utilizes among the most sophisticated DNS architecture, hardware, software and redundant design created. Afiliias' industry-leading system works in a seamless way to incorporate nameservers from any number of other secondary DNS service vendors. Please see our response to question #35 for full details, which we request be incorporated here by reference.
- Dissemination of TLD zone files: Afiliias' distinctive architecture allows for real-time updates and maximum stability for zone file generation, publication and dissemination. Please see our response to question #34 for full details, which we request be incorporated here by reference.
- Dissemination of contact or other information concerning domain registrations: A port 43 WHOIS service with basic and expanded search capabilities with requisite measures to prevent abuse. Please

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see our response to question #26 for full details, which we request be incorporated here by reference.

- Internationalized Domain Names (IDNs): Ability to support all Unicode characters at every level of the TLD, including alphabetic, ideographic and right-to-left scripts. Please see our response to question #44 for full details, which we request be incorporated here by reference.
- DNS Security Extensions (DNSSEC): A fully DNSSEC-enabled registry, with a stable and efficient means of signing and managing zones. This includes the ability to safeguard keys and manage keys completely. Please see our response to question #43 for full details, which we request be incorporated here by reference.

Each service will meet or exceed the contract service level agreement. All registry services for this TLD will be provided in a standards-compliant manner.

Security

Afilias addresses security in every significant aspect - physical, data and network as well as process. Afilias' approach to security permeates every aspect of the registry services provided. A dedicated security function exists within the company to continually identify existing and potential threats, and to put in place comprehensive mitigation plans for each identified threat. In addition, a rapid security response plan exists to respond comprehensively to unknown or unidentified threats. The specific threats and Afilias mitigation plans are defined in our response to question #30(b); please see that response for complete information. In short, Afilias is committed to ensuring the confidentiality, integrity, and availability of all information.

New registry services

No new registry services are planned for the launch of this TLD.

Additional services to support registry operation

Numerous supporting services and functions facilitate effective management of the TLD. These support services are also supported by Afilias, including:

- Customer support: 24x7 live phone and e-mail support for customers to address any access, update or other issues they may encounter. This includes assisting the customer identification of the problem as well as solving it. Customers include registrars and the registry operator, but not registrants except in unusual circumstances. Customers have access to a web-based portal for a rapid and transparent view of the status of pending issues.
- Financial services: billing and account reconciliation for all registry services according to pricing established in respective agreements.

Reporting is an important component of supporting registry operations. Afilias will provide reporting to the registry operator and registrars, and financial reporting.

Reporting provided to the registry operator

Afilias provides an extensive suite of reports to the registry operator, including daily, weekly and monthly reports with data at the transaction level that enable the registry operator to track and reconcile at whatever level of detail preferred. Afilias provides the exact data required by ICANN in the required format to enable the registry operator to meet its technical reporting requirements to ICANN.

In addition, Afilias offers access to a data warehouse capability that will enable near real-time data to be available 24x7. This can be arranged by informing the Afilias Account Manager regarding who should have access. Afilias' data warehouse capability enables drill-down analytics all the way to the transaction level.

Reporting available to registrars

Afilias provides an extensive suite of reporting to registrars and has been doing so in an exemplary manner for more than ten years. Specifically, Afilias provides daily, weekly and monthly reports with detail at the transaction level to enable registrars to track and reconcile at whatever level of detail they prefer.

Reports are provided in standard formats, facilitating import for use by virtually any registrar analytical tool. Registrar reports are available for download via a secure administrative interface. A given registrar will only have access to its own reports. These include the following:

- Daily Reports: Transaction Report, Billable Transactions Report, and Transfer Reports;
- Weekly: Domain Status and Nameserver Report, Weekly Nameserver Report, Domains Hosted by Nameserver Weekly Report, and;

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- Monthly: Billing Report and Monthly Expiring Domains Report.

Weekly registrar reports are maintained for each registrar for four weeks. Weekly reports older than four weeks will be archived for a period of six months, after which they will be deleted.

Financial reporting

Registrar account balances are updated real-time when payments and withdrawals are posted to the registrars' accounts. In addition, the registrar account balances are updated as and when they perform billable transactions at the registry level.

Afilias provides Deposit/Withdrawal Reports that are updated periodically to reflect payments received or credits and withdrawals posted to the registrar accounts.

The following reports are also available: a) Daily Billable Transaction Report, containing details of all the billable transactions performed by all the registrars in the SRS, b) daily e-mail reports containing the number of domains in the registry and a summary of the number and types of billable transactions performed by the registrars, and c) registry operator versions of most registrar reports (for example, a daily Transfer Report that details all transfer activity between all of the registrars in the SRS).

Afilias approach to registry support

Afilias, the back end registry services provider for this TLD, is dedicated to managing the technical operations and support of this TLD in a secure, stable and reliable manner. With over a decade of registry experience, Afilias has the depth and breadth of experience that ensure existing and new needs are addressed, all while meeting or exceeding service level requirements and customer expectations. This is evident in Afilias' participation in business, policy and technical organizations supporting registry and Internet technology within ICANN and related organizations. This allows Afilias to be at the forefront of security initiatives such as: DNSSEC, wherein Afilias worked with Public Interest Registry (PIR) to make the .ORG registry the first DNSSEC enabled gTLD and the largest TLD enabled at the time; in enhancing the Internet experience for users across the globe by leading development of IDNs; in pioneering the use of open-source technologies by its usage of PostgreSQL, and; being the first to offer near-real-time dissemination of DNS zone data.

Demonstration of Technical & Operational Capability

24. Shared Registration System (SRS) Performance

THE RESPONSE FOR THIS QUESTION USES ANGLE BRACKETS (THE “ (” and “) ” CHARACTERS, or < and >), WHICH ICANN INFORMS US (CASE ID 11027) CANNOT BE PROPERLY RENDERED IN TAS DUE TO SECURITY CONCERNS. HENCE, THE ANSWER BELOW AS DISPLAYED IN TAS MAY NOT RENDER THE FULL RESPONSE AS INTENDED. THEREFORE, THE FULL ANSWER TO THIS QUESTION IS ALSO ATTACHED AS A PDF FILE, ACCORDING TO SPECIFIC GUIDANCE FROM ICANN UNDER CASE ID 11027.

24 SRS Performance

Answers for this question (#24) are provided directly from Afilias, the back-end provider of registry services for this TLD.

Afilias operates a state-of-the-art EPP-based Shared Registration System (SRS) that is secure, stable and reliable. The SRS is a critical component of registry operations that must balance the business requirements for the registry and its customers, such as numerous domain acquisition and management functions. The SRS meets or exceeds all ICANN requirements given that Afilias:

- Operates a secure, stable and reliable SRS which updates in real-time and in full compliance with Specification 6 of the new gTLD Registry Agreement;
- Is committed to continuously enhancing our SRS to meet existing and future needs;
- Currently exceeds contractual requirements and will perform in compliance with Specification 10 of the new gTLD Registry Agreement;
- Provides SRS functionality and staff, financial, and other resources to more than adequately meet the technical needs of this TLD, and;

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- Manages the SRS with a team of experienced technical professionals who can seamlessly integrate this TLD into the Afiliias registry platform and support the TLD in a secure, stable and reliable manner.

Description of operation of the SRS, including diagrams

Afiliias' SRS provides the same advanced functionality as that used in the .INFO and .ORG registries, as well as the fourteen other TLDs currently supported by Afiliias. The Afiliias registry system is standards-compliant and utilizes proven technology, ensuring global familiarity for registrars, and it is protected by our massively provisioned infrastructure that mitigates the risk of disaster.

EPP functionality is described fully in our response to question #25; please consider those answers incorporated here by reference. An abbreviated list of Afiliias SRS functionality includes:

- Domain registration: Afiliias provides registration of names in the TLD, in both ASCII and IDN forms, to accredited registrars via EPP and a web-based administration tool.
- Domain renewal: Afiliias provides services that allow registrars the ability to renew domains under sponsorship at any time. Further, the registry performs the automated renewal of all domain names at the expiration of their term, and allows registrars to rescind automatic renewals within a specified number of days after the transaction for a full refund.
- Transfer: Afiliias provides efficient and automated procedures to facilitate the transfer of sponsorship of a domain name between accredited registrars. Further, the registry enables bulk transfers of domains under the provisions of the Registry-Registrar Agreement.
- RGP and restoring deleted domain registrations: Afiliias provides support for the Redemption Grace Period (RGP) as needed, enabling the restoration of deleted registrations.
- Other grace periods and conformance with ICANN guidelines: Afiliias provides support for other grace periods that are evolving as standard practice inside the ICANN community. In addition, the Afiliias registry system supports the evolving ICANN guidelines on IDNs.

Afiliias also supports the basic check, delete, and modify commands.

As required for all new gTLDs, Afiliias provides "thick" registry system functionality. In this model, all key contact details for each domain are stored in the registry. This allows better access to domain data and provides uniformity in storing the information.

Afiliias' SRS complies today and will continue to comply with global best practices including relevant RFCs, ICANN requirements, and this TLD's respective domain policies. With over a decade of experience, Afiliias has fully documented and tested policies and procedures, and our highly skilled team members are active participants of the major relevant technology and standards organizations, so ICANN can be assured that SRS performance and compliance are met. Full details regarding the SRS system and network architecture are provided in responses to questions #31 and #32; please consider those answers incorporated here by reference.

SRS servers and software

All applications and databases for this TLD will run in a virtual environment currently hosted by a cluster of servers equipped with the latest Intel Westmere multi-core processors. (It is possible that by the time this application is evaluated and systems deployed, Westmere processors may no longer be the "latest"; the Afiliias policy is to use the most advanced, stable technology available at the time of deployment.) The data for the registry will be stored on storage arrays of solid state drives shared over a fast storage area network. The virtual environment allows the infrastructure to easily scale both vertically and horizontally to cater to changing demand. It also facilitates effective utilization of system resources, thus reducing energy consumption and carbon footprint.

The network firewalls, routers and switches support all applications and servers. Hardware traffic shapers are used to enforce an equitable access policy for connections coming from registrars. The registry system accommodates both IPv4 and IPv6 addresses. Hardware load balancers accelerate TLS/SSL handshaking and distribute load among a pool of application servers.

Each of the servers and network devices are equipped with redundant, hot-swappable components and multiple connections to ancillary systems. Additionally, 24x7 support agreements with a four-hour response time at all our data centers guarantee replacement of failed parts in the shortest time possible.

Examples of current system and network devices used are:

- Servers: Cisco UCS B230 blade servers
- SAN storage arrays: IBM Storwize V7000 with Solid State Drives
- SAN switches: Brocade 5100

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- Firewalls: Cisco ASA 5585-X
- Load balancers: F5 Big-IP 6900
- Traffic shapers: Procera PacketLogic PL8720
- Routers: Juniper MX40 3D
- Network switches: Cisco Nexus 7010, Nexus 5548, Nexus 2232

These system components are upgraded and updated as required, and have usage and performance thresholds which trigger upgrade review points. In each data center, there is a minimum of two of each network component, a minimum of 25 servers, and a minimum of two storage arrays.

Technical components of the SRS include the following items, continually checked and upgraded as needed: SRS, WHOIS, web admin tool, DNS, DNS distributor, reporting, invoicing tools, and deferred revenue system (as needed).

All hardware is massively provisioned to ensure stability under all forecast volumes from launch through "normal" operations of average daily and peak capacities. Each and every system application, server, storage and network device is continuously monitored by the Afilias Network Operations Center for performance and availability. The data gathered is used by dynamic predictive analysis tools in real-time to raise alerts for unusual resource demands. Should any volumes exceed established thresholds, a capacity planning review is instituted which will address the need for additions well in advance of their actual need.

SRS diagram and interconnectivity description

As with all core registry services, the SRS is run from a global cluster of registry system data centers, located in geographic centers with high Internet bandwidth, power, redundancy and availability. All of the registry systems will be run in a (n+1) setup, with a primary data center and a secondary data center. For detailed site information, please see our responses to questions #32 and #35. Registrars access the SRS in real-time using EPP.

A sample of the Afilias SRS technical and operational capabilities (displayed in Figure 24-a) include:

- Geographically diverse redundant registry systems;
- Load balancing implemented for all registry services (e.g. EPP, WHOIS, web admin) ensuring equal experience for all customers and easy horizontal scalability;
- Disaster Recovery Point objective for the registry is within one minute of the loss of the primary system;
- Detailed and tested contingency plan, in case of primary site failure, and;
- Daily reports, with secure access for confidentiality protection.

As evidenced in Figure 24-a, the SRS contains several components of the registry system. The interconnectivity ensures near-real-time distribution of the data throughout the registry infrastructure, timely backups, and up-to-date billing information.

The WHOIS servers are directly connected to the registry database and provide real-time responses to queries using the most up-to-date information present in the registry.

Committed DNS-related EPP objects in the database are made available to the DNS Distributor via a dedicated set of connections. The DNS Distributor extracts committed DNS-related EPP objects in real time and immediately inserts them into the zone for dissemination.

The Afilias system is architected such that read-only database connections are executed on database replicas and connections to the database master (where write-access is executed) are carefully protected to ensure high availability.

This interconnectivity is monitored, as is the entire registry system, according to the plans detailed in our response to question #42.

Synchronization scheme

Registry databases are synchronized both within the same data center and in the backup data center using a database application called Slony. For further details, please see the responses to questions #33 and #37. Slony replication of transactions from the publisher (master) database to its subscribers (replicas) works continuously to ensure the publisher and its subscribers remain synchronized. When the publisher database completes a transaction the Slony replication system ensures that each replica also processes the transaction. When there are no transactions to process, Slony "sleeps" until a transaction arrives or for one minute, whichever comes first. Slony "wakes up"

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each minute to confirm with the publisher that there has not been a transaction and thus ensures subscribers are synchronized and the replication time lag is minimized. The typical replication time lag between the publisher and subscribers depends on the topology of the replication cluster, specifically the location of the subscribers relative to the publisher. Subscribers located in the same data center as the publisher are typically updated within a couple of seconds, and subscribers located in a secondary data center are typically updated in less than ten seconds. This ensures real-time or near-real-time synchronization between all databases, and in the case where the secondary data center needs to be activated, it can be done with minimal disruption to registrars.

SRS SLA performance compliance

Afilias has a ten-year record of delivering on the demanding ICANN SLAs, and will continue to provide secure, stable and reliable service in compliance with SLA requirements as specified in the new gTLD Registry Agreement, Specification 10, as presented in Figure 24-b.

The Afilias SRS currently handles over 200 million EPP transactions per month for just .INFO and .ORG. Overall, the Afilias SRS manages over 700 million EPP transactions per month for all TLDs under management.

Given this robust functionality, and more than a decade of experience supporting a thick TLD registry with a strong performance history, Afilias, on behalf of Applicant, will meet or exceed the performance metrics in Specification 10 of the new gTLD Registry Agreement. The Afilias services and infrastructure are designed to scale both vertically and horizontally without any downtime to provide consistent performance as this TLD grows. The Afilias architecture is also massively provisioned to meet seasonal demands and marketing campaigns. Afilias' experience also gives high confidence in the ability to scale and grow registry operations for this TLD in a secure, stable and reliable manner.

SRS resourcing plans

Since its founding, Afilias is focused on delivering secure, stable and reliable registry services. Several essential management and staff who designed and launched the Afilias registry in 2001 and expanded the number of TLDs supported, all while maintaining strict service levels over the past decade, are still in place today. This experiential continuity will endure for the implementation and on-going maintenance of this TLD. Afilias operates in a matrix structure, which allows its staff to be allocated to various critical functions in both a dedicated and a shared manner. With a team of specialists and generalists, the Afilias project management methodology allows efficient and effective use of our staff in a focused way.

Over 100 Afilias team members contribute to the management of the SRS code and network that will support this TLD. The SRS team is composed of Software Engineers, Quality Assurance Analysts, Application Administrators, System Administrators, Storage Administrators, Network Administrators, Database Administrators, and Security Analysts located at three geographically separate Afilias facilities. The systems and services set up and administered by these team members are monitored 24x7 by skilled analysts at two NOCs located in Toronto, Ontario (Canada) and Horsham, Pennsylvania (USA). In addition to these team members, Afilias also utilizes trained project management staff to maintain various calendars, work breakdown schedules, utilization and resource schedules and other tools to support the technical and management staff. It is this team who will both deploy this TLD on the Afilias infrastructure, and maintain it. Together, the Afilias team has managed 11 registry transitions and six new TLD launches, which illustrate its ability to securely and reliably deliver regularly scheduled updates as well as a secure, stable and reliable SRS service for this TLD.

25. Extensible Provisioning Protocol (EPP)

THE RESPONSE FOR THIS QUESTION USES ANGLE BRACKETS (THE “<” and “>” CHARACTERS, or < and >), WHICH ICANN INFORMS US (CASE ID 11027) CANNOT BE PROPERLY RENDERED IN TAS DUE TO SECURITY CONCERNS. HENCE, THE ANSWER BELOW AS DISPLAYED IN TAS MAY NOT RENDER THE FULL RESPONSE AS INTENDED. THEREFORE, THE FULL ANSWER TO THIS QUESTION IS ALSO ATTACHED AS A PDF FILE, ACCORDING TO SPECIFIC GUIDANCE FROM ICANN UNDER CASE ID 11027.

25 EPP

Answers for this question (#25) are provided by Afilias, the back-end provider of registry services for this TLD.

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Afilias has been a pioneer and innovator in the use of EPP. .INFO was the first EPP-based gTLD registry and launched on EPP version 02/00. Afilias has a track record of supporting TLDs on standards-compliant versions of EPP. Afilias will operate the EPP registrar interface as well as a web-based interface for this TLD in accordance with RFCs and global best practices. In addition, Afilias will maintain a proper OT&E (Operational Testing and Evaluation) environment to facilitate registrar system development and testing.

Afilias' EPP technical performance meets or exceeds all ICANN requirements as demonstrated by:

- A completely functional, state-of-the-art, EPP-based SRS that currently meets the needs of various gTLDs and will meet this new TLD's needs;
- A track record of success in developing extensions to meet client and registrar business requirements such as multi-script support for IDNs;
- Supporting six ICANN gTLDs on EPP: .INFO, .ORG, .MOBI, .AERO, .ASIA and .XXX
- EPP software that is operating today and has been fully tested to be standards-compliant;
- Proven interoperability of existing EPP software with ICANN-accredited registrars, and;
- An SRS that currently processes over 200 million EPP transactions per month for both .INFO and .ORG. Overall, Afilias processes over 700 million EPP transactions per month for all 16 TLDs under management.

The EPP service is offered in accordance with the performance specifications defined in the new gTLD Registry Agreement, Specification 10.

EPP Standards

The Afilias registry system complies with the following revised versions of the RFCs and operates multiple ICANN TLDs on these standards, including .INFO, .ORG, .MOBI, .ASIA and .XXX. The systems have been tested by our Quality Assurance ("QA") team for RFC compliance, and have been used by registrars for an extended period of time:

- 3735 - Guidelines for Extending EPP
- 3915 - Domain Registry Grace Period Mapping
- 5730 - Extensible Provisioning Protocol (EPP)
- 5731 - Domain Name Mapping
- 5732 - Host Mapping
- 5733 - Contact Mapping
- 5734 - Transport Over TCP
- 5910 - Domain Name System (DNS) Security Extensions Mapping for the Extensible Provisioning Protocol (EPP)

This TLD will support all valid EPP commands. The following EPP commands are in operation today and will be made available for this TLD. See attachment #25a for the base set of EPP commands and copies of Afilias XSD schema files, which define all the rules of valid, RFC compliant EPP commands and responses that Afilias supports. Any customized EPP extensions, if necessary, will also conform to relevant RFCs.

Afilias staff members actively participated in the Internet Engineering Task Force (IETF) process that finalized the new standards for EPP. Afilias will continue to actively participate in the IETF and will stay abreast of any updates to the EPP standards.

EPP software interface and functionality

Afilias will provide all registrars with a free open-source EPP toolkit. Afilias provides this software for use with both Microsoft Windows and Unix/Linux operating systems. This software, which includes all relevant templates and schema defined in the RFCs, is available on sourceforge.net and will be available through the registry operator's website.

Afilias' SRS EPP software complies with all relevant RFCs and includes the following functionality:

- EPP Greeting: A response to a successful connection returns a greeting to the client. Information exchanged can include: name of server, server date and time in UTC, server features, e.g., protocol versions supported, languages for the text response supported, and one or more elements which identify the objects that the server is capable of managing;
- Session management controls: <login> to establish a connection with a server, and <logout> to end a session;
- EPP Objects: Domain, Host and Contact for respective mapping functions;
- EPP Object Query Commands: Info, Check, and Transfer (query) commands to retrieve object information, and;
- EPP Object Transform Commands: five commands to transform objects: <create> to create an instance of an object, <delete> to remove an instance of an object, <renew> to extend the validity period

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of an object, {update} to change information associated with an object, and {transfer} to manage changes in client sponsorship of a known object.

Currently, 100% of the top domain name registrars in the world have software that has already been tested and certified to be compatible with the Afiliast SRS registry. In total, over 375 registrars, representing over 95% of all registration volume worldwide, operate software that has been certified compatible with the Afiliast SRS registry. Afiliast's EPP Registrar Acceptance Criteria are available in attachment #25b, EPP OT&E Criteria.

Free EPP software support

Afiliast analyzes and diagnoses registrar EPP activity log files as needed and is available to assist registrars who may require technical guidance regarding how to fix repetitive errors or exceptions caused by misconfigured client software.

Registrars are responsible for acquiring a TLS/SSL certificate from an approved certificate authority, as the registry-registrar communication channel requires mutual authentication; Afiliast will acquire and maintain the server-side TLS/SSL certificate. The registrar is responsible for developing support for TLS/SSL in their client application. Afiliast will provide free guidance for registrars unfamiliar with this requirement.

Registrar data synchronization

There are two methods available for registrars to synchronize their data with the registry:

- Automated synchronization: Registrars can, at any time, use the EPP {info} command to obtain definitive data from the registry for a known object, including domains, hosts (nameservers) and contacts.
- Personalized synchronization: A registrar may contact technical support and request a data file containing all domains (and associated host (nameserver) and contact information) registered by that registrar, within a specified time interval. The data will be formatted as a comma separated values (CSV) file and made available for download using a secure server.

EPP modifications

There are no unique EPP modifications planned for this TLD.

All ICANN TLDs must offer a Sunrise as part of a rights protection program. Afiliast uses EPP extensions that allow registrars to submit trademark and other intellectual property rights (IPR) data to the registry. These extensions are:

- An {ipr:name} element that indicates the name of Registered Mark.
- An {ipr:number} element that indicates the registration number of the IPR.
- An {ipr:ccLocality} element that indicates the origin for which the IPR is established (a national or international trademark registry).
- An {ipr:entitlement} element that indicates whether the applicant holds the trademark as the original "OWNER", "CO-OWNER" or "ASSIGNEE".
- An {ipr:appDate} element that indicates the date the Registered Mark was applied for.
- An {ipr:regDate} element that indicates the date the Registered Mark was issued and registered.
- An {ipr:class} element that indicates the class of the registered mark.
- An {ipr:type} element that indicates the Sunrise phase the application applies for.

Note that some of these extensions might be subject to change based on ICANN-developed requirements for the Trademark Clearinghouse.

EPP resourcing plans

Since its founding, Afiliast is focused on delivering secure, stable and reliable registry services. Several essential management and staff who designed and launched the Afiliast registry in 2001 and expanded the number of TLDs supported, all while maintaining strict service levels over the past decade, are still in place today. This experiential continuity will endure for the implementation and on-going maintenance of this TLD. Afiliast operates in a matrix structure, which allows its staff to be allocated to various critical functions in both a dedicated and a shared manner. With a team of specialists and generalists, the Afiliast project management methodology allows efficient and effective use of our staff in a focused way.

108 Afiliast team members directly contribute to the management and development of the EPP based registry systems. As previously noted, Afiliast is an active member of IETF and has a long documented history developing and enhancing EPP. These contributors include 11 developers and 14 QA engineers focused on maintaining and enhancing EPP server side software. These engineers work directly with

business staff to timely address existing needs and forecast registry/registrar needs to ensure the Afiliias EPP software is effective today and into the future. A team of eight data analysts work with the EPP software system to ensure that the data flowing through EPP is securely and reliably stored in replicated database systems. In addition to the EPP developers, QA engineers, and data analysts, other EPP contributors at Afiliias include: Technical Analysts, the Network Operations Center and Data Services team members.

26. Whois

Answers for this question (#26) are provided by Afiliias, the back-end provider of registry services for this TLD.

Afiliias operates the WHOIS (registration data directory service) infrastructure in accordance with RFCs and global best practices, as it does for the 16 TLDs it currently supports. Designed to be robust and scalable, Afiliias' WHOIS service has exceeded all contractual requirements for over a decade. It has extended search capabilities, and methods of limiting abuse.

The WHOIS service operated by Afiliias meets and exceeds ICANN's requirements. Specifically, Afiliias will:

- Offer a WHOIS service made available on port 43 that is flexible and standards-compliant;
- Comply with all ICANN policies, and meeting or exceeding WHOIS performance requirements in Specification 10 of the new gTLD Registry Agreement;
- Enable a Searchable WHOIS with extensive search capabilities that offers ease of use while enforcing measures to mitigate access abuse, and;
- Employ a team with significant experience managing a compliant WHOIS service.

Such extensive knowledge and experience managing a WHOIS service enables Afiliias to offer a comprehensive plan for this TLD that meets the needs of constituents of the domain name industry and Internet users. The service has been tested by our QA team for RFC compliance, and has been used by registrars and many other parties for an extended period of time. Afiliias' WHOIS service currently serves almost 500 million WHOIS queries per month, with the capacity already built in to handle an order of magnitude increase in WHOIS queries, and the ability to smoothly scale should greater growth be needed.

WHOIS system description and diagram

The Afiliias WHOIS system, depicted in figure 26-a, is designed with robustness, availability, compliance, and performance in mind. Additionally, the system has provisions for detecting abusive usage (e.g., excessive numbers of queries from one source). The WHOIS system is generally intended as a publicly available single object lookup system. Afiliias uses an advanced, persistent caching system to ensure extremely fast query response times.

Afiliias will develop restricted WHOIS functions based on specific domain policy and regulatory requirements as needed for operating the business (as long as they are standards compliant). It will also be possible for contact and registrant information to be returned according to regulatory requirements. The WHOIS database supports multiple string and field searching through a reliable, free, secure web-based interface.

Data objects, interfaces, access and lookups

Registrars can provide an input form on their public websites through which a visitor is able to perform WHOIS queries. The registry operator can also provide a Web-based search on its site. The input form must accept the string to query, along with the necessary input elements to select the object type and interpretation controls. This input form sends its data to the Afiliias port 43 WHOIS server. The results from the WHOIS query are returned by the server and displayed in the visitor's Web browser. The sole purpose of the Web interface is to provide a user-friendly interface for WHOIS queries.

Afiliias will provide WHOIS output as per Specification 4 of the new gTLD Registry Agreement. The output for domain records generally consists of the following elements:

- The name of the domain registered and the sponsoring registrar;
- The names of the primary and secondary nameserver(s) for the registered domain name;
- The creation date, registration status and expiration date of the registration;
- The name, postal address, e-mail address, and telephone and fax numbers of the domain name holder;

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- The name, postal address, e-mail address, and telephone and fax numbers of the technical contact for the domain name holder;
- The name, postal address, e-mail address, and telephone and fax numbers of the administrative contact for the domain name holder, and;
- The name, postal address, e-mail address, and telephone and fax numbers of the billing contact for the domain name holder.

The following additional features are also present in Afilias' WHOIS service:

- Support for IDNs, including the language tag and the Punycode representation of the IDN in addition to Unicode Hex and Unicode HTML formats;
- Enhanced support for privacy protection relative to the display of confidential information.

Afilias will also provide sophisticated WHOIS search functionality that includes the ability to conduct multiple string and field searches.

Query controls

For all WHOIS queries, a user is required to enter the character string representing the information for which they want to search. The object type and interpretation control parameters to limit the search may also be specified. If object type or interpretation control parameter is not specified, WHOIS will search for the character string in the Name field of the Domain object.

WHOIS queries are required to be either an "exact search" or a "partial search," both of which are insensitive to the case of the input string.

An exact search specifies the full string to search for in the database field. An exact match between the input string and the field value is required.

A partial search specifies the start of the string to search for in the database field. Every record with a search field that starts with the input string is considered a match. By default, if multiple matches are found for a query, then a summary containing up to 50 matching results is presented. A second query is required to retrieve the specific details of one of the matching records.

If only a single match is found, then full details will be provided. Full detail consists of the data in the matching object as well as the data in any associated objects. For example: a query that results in a domain object includes the data from the associated host and contact objects.

WHOIS query controls fall into two categories: those that specify the type of field, and those that modify the interpretation of the input or determine the level of output to provide. Each is described below.

The following keywords restrict a search to a specific object type:

- Domain: Searches only domain objects. The input string is searched in the Name field.
 - Host: Searches only nameserver objects. The input string is searched in the Name field and the IP Address field.
 - Contact: Searches only contact objects. The input string is searched in the ID field.
 - Registrar: Searches only registrar objects. The input string is searched in the Name field.
- By default, if no object type control is specified, then the Name field of the Domain object is searched.

In addition, Afilias WHOIS systems can perform and respond to WHOIS searches by registrant name, postal address and contact names. Deployment of these features is provided as an option to the registry operator, based upon registry policy and business decision making.

Figure 26-b presents the keywords that modify the interpretation of the input or determine the level of output to provide.

By default, if no interpretation control keywords are used, the output will include full details if a single match is found and a summary if multiple matches are found.

Unique TLD requirements

There are no unique WHOIS requirements for this TLD.

Sunrise WHOIS processes

All ICANN TLDs must offer a Sunrise as part of a rights protection program. Afilias uses EPP extensions that allow registrars to submit trademark and other intellectual property rights (IPR) data to the registry. The following corresponding data will be displayed in WHOIS for relevant

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domains:

- Trademark Name: element that indicates the name of the Registered Mark.
- Trademark Number: element that indicates the registration number of the IPR.
- Trademark Locality: element that indicates the origin for which the IPR is established (a national or international trademark registry).
- Trademark Entitlement: element that indicates whether the Applicant holds the trademark as the original "OWNER", "CO-OWNER" or "ASSIGNEE".
 - Trademark Application Date: element that indicates the date the Registered Mark was applied for.
- Trademark Registration Date: element that indicates the date the Registered Mark was issued and registered.
- Trademark Class: element that indicates the class of the Registered Mark.
- IPR Type: element that indicates the Sunrise phase the application applies for.

IT and infrastructure resources

All the applications and databases for this TLD will run in a virtual environment hosted by a cluster of servers equipped with the latest Intel Westmere multi-core processors (or a more advanced, stable technology available at the time of deployment). The registry data will be stored on storage arrays of solid-state drives shared over a fast storage area network. The virtual environment allows the infrastructure to easily scale both vertically and horizontally to cater to changing demand. It also facilitates effective utilization of system resources thus reducing energy consumption and carbon footprint.

The applications and servers are supported by network firewalls, routers and switches. The WHOIS system accommodates both IPv4 and IPv6 addresses.

Each of the servers and network devices are equipped with redundant hot-swappable components and multiple connections to ancillary systems. Additionally, 24x7 support agreements with our hardware vendor with a 4-hour response time at all our data centers guarantees replacement of failed parts in the shortest time possible.

Models of system and network devices used are:

- Servers: Cisco UCS B230 blade servers
- SAN storage arrays: IBM Storwize V7000 with Solid State Drives
- Firewalls: Cisco ASA 5585-X
- Load balancers: F5 Big-IP 6900
- Traffic shapers: Procera PacketLogic PL8720
- Routers: Juniper MX40 3D
- Network switches: Cisco Nexus 7010, Nexus 5548, Nexus 2232

There will be at least four virtual machines (VMs) offering WHOIS service. Each VM will run at least two WHOIS server instances - one for registrars and one for the public. All instances of the WHOIS service is made available to registrars and the public are rate limited to mitigate abusive behavior.

Frequency of synchronization between servers

Registration data records from the EPP publisher database will be replicated to the WHOIS system database on a near-real-time basis whenever an update occurs.

Specifications 4 and 10 compliance

The WHOIS service for this TLD will meet or exceed the performance requirements in the new gTLD Registry Agreement, Specification 10. Figure 26-c provides the exact measurements and commitments. Afilias has a 10 year track record of exceeding WHOIS performance and a skilled team to ensure this continues for all TLDs under management.

The WHOIS service for this TLD will meet or exceed the requirements in the new gTLD Registry Agreement, Specification 4.

RFC 3912 compliance

Afilias will operate the WHOIS infrastructure in compliance with RFCs and global best practices, as it does with the 16 TLDs Afilias currently supports.

Afilias maintains a registry-level centralized WHOIS database that contains information for every registered domain and for all host and contact objects. The WHOIS service will be available on the Internet standard WHOIS port (port 43) in compliance with RFC 3912. The WHOIS service contains data submitted by registrars during the registration process. Changes made to the data by a registrant are submitted to Afilias by the registrar and are reflected in the WHOIS database and service in near-

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real-time, by the instance running at the primary data center, and in under ten seconds by the instance running at the secondary data center, thus providing all interested parties with up-to-date information for every domain. This service is compliant with the new gTLD Registry Agreement, Specification 4.

The WHOIS service maintained by Afilias will be authoritative and complete, as this will be a "thick" registry (detailed domain contact WHOIS is all held at the registry); users do not have to query different registrars for WHOIS information, as there is one central WHOIS system. Additionally, visibility of different types of data is configurable to meet the registry operator's needs.

Searchable WHOIS

Afilias offers a searchable WHOIS on a web-based Directory Service. Partial match capabilities are offered on the following fields: domain name, registrar ID, and IP address. In addition, Afilias WHOIS systems can perform and respond to WHOIS searches by registrant name, postal address and contact names.

Providing the ability to search important and high-value fields such as registrant name, address and contact names increases the probability of abusive behavior. An abusive user could script a set of queries to the WHOIS service and access contact data in order to create or sell a list of names and addresses of registrants in this TLD. Making the WHOIS machine readable, while preventing harvesting and mining of WHOIS data, is a key requirement integrated into the Afilias WHOIS systems. For instance, Afilias limits search returns to 50 records at a time. If bulk queries were ever necessary (e.g., to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process), Afilias makes such query responses available to carefully screened and limited staff members at the registry operator (and customer support staff) via an internal data warehouse. The Afilias WHOIS system accommodates anonymous access as well as pre-identified and profile-defined uses, with full audit and log capabilities.

The WHOIS service has the ability to tag query responses with labels such as "Do not redistribute" or "Special access granted". This may allow for tiered response and reply scenarios. Further, the WHOIS service is configurable in parameters and fields returned, which allow for flexibility in compliance with various jurisdictions, regulations or laws.

Afilias offers exact-match capabilities on the following fields: registrar ID, nameserver name, and nameserver's IP address (only applies to IP addresses stored by the registry, i.e., glue records). Search capabilities are fully available, and results include domain names matching the search criteria (including IDN variants). Afilias manages abuse prevention through rate limiting and CAPTCHA (described below). Queries do not require specialized transformations of internationalized domain names or internationalized data fields

Please see "Query Controls" above for details about search options and capabilities.

Detering WHOIS abuse

Afilias has adopted two best practices to prevent abuse of the WHOIS service: rate limiting and CAPTCHA.

Abuse of WHOIS services on port 43 and via the Web is subject to an automated rate-limiting system. This ensures that uniformity of service to users is unaffected by a few parties whose activities abuse or otherwise might threaten to overload the WHOIS system.

Abuse of web-based public WHOIS services is subject to the use of CAPTCHA (Completely Automated Public Turing test to tell Computers and Humans Apart) technology. The use of CAPTCHA ensures that uniformity of service to users is unaffected by a few parties whose activities abuse or otherwise might threaten to overload the WHOIS system. The registry operator will adopt a CAPTCHA on its Web-based WHOIS.

Data mining of any sort on the WHOIS system is strictly prohibited, and this prohibition is published in WHOIS output and in terms of service.

For rate limiting on IPv4, there are configurable limits per IP and subnet. For IPv6, the traditional limitations do not apply. Whenever a unique IPv6 IP address exceeds the limit of WHOIS queries per minute, the same rate-limit for the given 64 bits of network prefix that the offending IPv6 IP address falls into will be applied. At the same time, a timer will start and rate-limit validation logic will identify if there are any other IPv6 address within the original 80-bit(/48) prefix. If another offending IPv6 address does fall into the /48 prefix then rate-limit validation logic will

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penalize any other IPv6 addresses that fall into that given 80-bit (/48) network. As a security precaution, Afilias will not disclose these limits.

Pre-identified and profile-driven role access allows greater granularity and configurability in both access to the WHOIS service, and in volume/frequency of responses returned for queries.

Afilias staff are key participants in the ICANN Security & Stability Advisory Committee's deliberations and outputs on WHOIS, including SAC003, SAC027, SAC033, SAC037, SAC040, and SAC051. Afilias staff are active participants in both technical and policy decision making in ICANN, aimed at restricting abusive behavior.

WHOIS staff resourcing plans

Since its founding, Afilias is focused on delivering secure, stable and reliable registry services. Several essential management and staff who designed and launched the Afilias registry in 2001 and expanded the number of TLDs supported, all while maintaining strict service levels over the past decade, are still in place today. This experiential continuity will endure for the implementation and on-going maintenance of this TLD. Afilias operates in a matrix structure, which allows its staff to be allocated to various critical functions in both a dedicated and a shared manner. With a team of specialists and generalists, the Afilias project management methodology allows efficient and effective use of our staff in a focused way.

Within Afilias, there are 11 staff members who develop and maintain the compliant WHOIS systems. They keep pace with access requirements, thwart abuse, and continually develop software. Of these resources, approximately two staffers are typically required for WHOIS-related code customization. Other resources provide quality assurance, and operations personnel maintain the WHOIS system itself. This team will be responsible for the implementation and on-going maintenance of the new TLD WHOIS service.

27. Registration Life Cycle

THE RESPONSE FOR THIS QUESTION USES ANGLE BRACKETS (THE “{” and “}” CHARACTERS, or < and >), WHICH ICANN INFORMS US (CASE ID 11027) CANNOT BE PROPERLY RENDERED IN TAS DUE TO SECURITY CONCERNS. HENCE, THE ANSWER BELOW AS DISPLAYED IN TAS MAY NOT RENDER THE FULL RESPONSE AS INTENDED. THEREFORE, THE FULL ANSWER TO THIS QUESTION IS ALSO ATTACHED AS A PDF FILE, ACCORDING TO SPECIFIC GUIDANCE FROM ICANN UNDER CASE ID 11027.

27 Registration Lifecycle

Answers for this question (#27) are provided by Afilias, the back-end provider of registry services for this TLD.

Afilias has been managing registrations for over a decade. Afilias has had experience managing registrations for over a decade and supports comprehensive registration lifecycle services including the registration states, all standard grace periods, and can address any modifications required with the introduction of any new ICANN policies.

This TLD will follow the ICANN standard domain lifecycle, as is currently implemented in TLDs such as .ORG and .INFO. The below response includes: a diagram and description of the lifecycle of a domain name in this TLD, including domain creation, transfer protocols, grace period implementation and the respective time frames for each; and the existing resources to support the complete lifecycle of a domain.

As depicted in Figure 27-a, prior to the beginning of the Trademark Claims Service or Sunrise IP protection program[s], Afilias will support the reservation of names in accordance with the new gTLD Registry Agreement, Specification 5.

Registration period

After the IP protection programs and the general launch, eligible registrants may choose an accredited registrar to register a domain name. The registrar will check availability on the requested domain name and if available, will collect specific objects such as, the required contact and host information from the registrant. The registrar will then provision the information into the registry system using standard Extensible Provisioning Protocol (“EPP”) commands through a secure connection to the registry backend service provider.

When the domain is created, the standard five day Add Grace Period begins, the domain and contact information are available in WHOIS, and normal operating EPP domain statuses will apply. Other specifics regarding registration rules for an active domain include:

- The domain must be unique;
 - Restricted or reserved domains cannot be registered;
 - The domain can be registered from 1-10 years;
 - The domain can be renewed at any time for 1-10 years, but cannot exceed 10 years;
 - The domain can be explicitly deleted at any time;
 - The domain can be transferred from one registrar to another except during the first 60 days following a successful registration or within 60 days following a transfer; and,
- Contacts and hosts can be modified at any time.

The following describe the domain status values recognized in WHOIS when using the EPP protocol following RFC 5731.

- OK or Active: This is the normal status for a domain that has no pending operations or restrictions.
- Inactive: The domain has no delegated name servers.
- Locked: No action can be taken on the domain. The domain cannot be renewed, transferred, updated, or deleted. No objects such as contacts or hosts can be associated to, or disassociated from the domain. This status includes: Delete Prohibited / Server Delete Prohibited, Update Prohibited / Server Update Prohibited, Transfer Prohibited, Server Transfer Prohibited, Renew Prohibited, Server Renew Prohibited.
- Hold: The domain will not be included in the zone. This status includes: Client Hold, Server Hold.
- Transfer Prohibited: The domain cannot be transferred away from the sponsoring registrar. This status includes: Client Transfer Prohibited, Server Transfer Prohibited.

The following describe the registration operations that apply to the domain name during the registration period.

a. Domain modifications: This operation allows for modifications or updates to the domain attributes to include:

- i. Registrant Contact
- ii. Admin Contact
- iii. Technical Contact
- iv. Billing Contact
- v. Host or nameservers
- vi. Authorization information
- vii. Associated status values

A domain with the EPP status of Client Update Prohibited or Server Update Prohibited may not be modified until the status is removed.

b. Domain renewals: This operation extends the registration period of a domain by changing the expiration date. The following rules apply:

- i. A domain can be renewed at any time during its registration term,
- ii. The registration term cannot exceed a total of 10 years.

A domain with the EPP status of Client Renew Prohibited or Server Renew Prohibited cannot be renewed.

c. Domain deletions: This operation deletes the domain from the Shared Registry Services (SRS). The following rules apply:

- i. A domain can be deleted at any time during its registration term, if the domain is deleted during the Add Grace Period or the Renew/Extend Grace Period, the sponsoring registrar will receive a credit,
 - ii. A domain cannot be deleted if it has "child" nameservers that are associated to other domains.
- A domain with the EPP status of Client Delete Prohibited or Server Delete Prohibited cannot be deleted.

d. Domain transfers: A transfer of the domain from one registrar to another is conducted by following the steps below.

- i. The registrant must obtain the applicable {authInfo} code from the sponsoring (losing) registrar.
 - Every domain name has an authInfo code as per EPP RFC 5731. The authInfo code is a six- to 16-character code assigned by the registrar at the time the name was created. Its purpose is to aid identification of the domain owner so proper authority can be established (it is the "password" to the domain).
 - Under the Registry-Registrar Agreement, registrars will be required to provide a copy of the authInfo code to the domain registrant upon his or her request.
- ii. The registrant must provide the authInfo code to the new (gaining) registrar, who will then initiate a domain transfer request. A transfer cannot be initiated without the authInfo code.

- Every EPP {transfer} command must contain the authInfo code or the request will fail. The authInfo code represents authority to the registry to initiate a transfer.
 - iii. Upon receipt of a valid transfer request, the registry automatically asks the sponsoring (losing) registrar to approve the request within five calendar days.
 - When a registry receives a transfer request the domain cannot be modified, renewed or deleted until the request has been processed. This status must not be combined with either Client Transfer Prohibited or Server Transfer Prohibited status.
 - If the sponsoring (losing) registrar rejects the transfer within five days, the transfer request is cancelled. A new domain transfer request will be required to reinitiate the process.
 - If the sponsoring (losing) registrar does not approve or reject the transfer within five days, the registry automatically approves the request.
 - iv. After a successful transfer, it is strongly recommended that registrars change the authInfo code, so that the prior registrar or registrant cannot use it anymore.
 - v. Registrars must retain all transaction identifiers and codes associated with successful domain object transfers and protect them from disclosure.
 - vi. Once a domain is successfully transferred the status of TRANSFERPERIOD is added to the domain for a period of five days.
 - vii. Successful transfers will result in a one year term extension (resulting in a maximum total of 10 years), which will be charged to the gaining registrar.
 - e. Bulk transfer: Afilias, supports bulk transfer functionality within the SRS for situations where ICANN may request the registry to perform a transfer of some or all registered objects (includes domain, contact and host objects) from one registrar to another registrar. Once a bulk transfer has been executed, expiry dates for all domain objects remain the same, and all relevant states of each object type are preserved. In some cases the gaining and the losing registrar as well as the registry must approved bulk transfers. A detailed log is captured for each bulk transfer process and is archived for audit purposes.
- Applicant will support ICANN's Transfer Dispute Resolution Process. Applicant will work with Afilias to respond to Requests for Enforcement (law enforcement or court orders) and will follow that process.

1. Auto-renew grace period

The Auto-Renew Grace Period displays as AUTORENEWPERIOD in WHOIS. An auto-renew must be requested by the registrant through the sponsoring registrar and occurs if a domain name registration is not explicitly renewed or deleted by the expiration date and is set to a maximum of 45 calendar days. In this circumstance the registration will be automatically renewed by the registry system the first day after the expiration date. If a Delete, Extend, or Transfer occurs within the AUTORENEWPERIOD the following rules apply:

- i. Delete. If a domain is deleted the sponsoring registrar at the time of the deletion receives a credit for the auto-renew fee. The domain then moves into the Redemption Grace Period with a status of PENDING DELETE RESTORABLE.
- ii. Renew/Extend. A domain can be renewed as long as the total term does not exceed 10 years. The account of the sponsoring registrar at the time of the extension will be charged for the additional number of years the registration is renewed.
- iii. Transfer (other than ICANN-approved bulk transfer). If a domain is transferred, the losing registrar is credited for the auto-renew fee, and the year added by the operation is cancelled. As a result of the transfer, the expiration date of the domain is extended by minimum of one year as long as the total term does not exceed 10 years. The gaining registrar is charged for the additional transfer year(s) even in cases where a full year is not added because of the maximum 10 year registration restriction.

2. Redemption grace period

During this period, a domain name is placed in the PENDING DELETE RESTORABLE status when a registrar requests the deletion of a domain that is not within the Add Grace Period. A domain can remain in this state for up to 30 days and will not be included in the zone file. The only action a registrar can take on a domain is to request that it be restored. Any other registrar requests to modify or otherwise update the domain will be rejected. If the domain is restored it moves into PENDING RESTORE and then OK. After 30 days if the domain is not restored it moves into PENDING DELETE SCHEDULED FOR RELEASE before the domain is released back into the pool of available domains.

3. Pending delete

During this period, a domain name is placed in PENDING DELETE SCHEDULED FOR RELEASE status for five days, and all Internet services associated with the domain will remain disabled and domain cannot be restored. After five days the domain is released back into the pool of available domains.

Other grace periods

All ICANN required grace periods will be implemented in the registry backend service provider's system including the Add Grace Period (AGP), Renew/Extend Grace Period (EGP), Transfer Grace Period (TGP), Auto-Renew Grace Period (ARGP), and Redemption Grace Period (RGP). The lengths of grace periods are configurable in the registry system. At this time, the grace periods will be implemented following other gTLDs such as .ORG. More than one of these grace periods may be in effect at any one time. The following are accompanying grace periods to the registration lifecycle.

Add grace period

The Add Grace Period displays as ADDPERIOD in WHOIS and is set to five calendar days following the initial registration of a domain. If the domain is deleted by the registrar during this period, the registry provides a credit to the registrar for the cost of the registration. If a Delete, Renew/Extend, or Transfer operation occurs within the five calendar days, the following rules apply.

- i. Delete. If a domain is deleted within this period the sponsoring registrar at the time of the deletion is credited for the amount of the registration. The domain is deleted from the registry backend service provider's database and is released back into the pool of available domains.
- ii. Renew/Extend. If the domain is renewed within this period and then deleted, the sponsoring registrar will receive a credit for both the registration and the extended amounts. The account of the sponsoring registrar at the time of the renewal will be charged for the initial registration plus the number of years the registration is extended. The expiration date of the domain registration is extended by that number of years as long as the total term does not exceed 10 years.
- iii. Transfer (other than ICANN-approved bulk transfer). Transfers under Part A of the ICANN Policy on Transfer of Registrations between registrars may not occur during the ADDPERIOD or at any other time within the first 60 days after the initial registration. Enforcement is the responsibility of the registrar sponsoring the domain name registration and is enforced by the SRS.

Renew / extend grace period

The Renew / Extend Grace Period displays as RENEWPERIOD in WHOIS and is set to five calendar days following an explicit renewal on the domain by the registrar. If a Delete, Extend, or Transfer occurs within the five calendar days, the following rules apply:

- i. Delete. If a domain is deleted within this period the sponsoring registrar at the time of the deletion receives a credit for the renewal fee. The domain then moves into the Redemption Grace Period with a status of PENDING DELETE RESTORABLE.
 - ii. Renew/Extend. A domain registration can be renewed within this period as long as the total term does not exceed 10 years. The account of the sponsoring registrar at the time of the extension will be charged for the additional number of years the registration is renewed.
 - iii. Transfer (other than ICANN-approved bulk transfer). If a domain is transferred within the Renew/Extend Grace Period, there is no credit to the losing registrar for the renewal fee. As a result of the transfer, the expiration date of the domain registration is extended by a minimum of one year as long as the total term for the domain does not exceed 10 years.
- If a domain is auto-renewed, then extended, and then deleted within the Renew/Extend Grace Period, the registrar will be credited for any auto-renew fee charged and the number of years for the extension. The years that were added to the domain's expiration as a result of the auto-renewal and extension are removed. The deleted domain is moved to the Redemption Grace Period with a status of PENDING DELETE RESTORABLE.

Transfer Grace Period

The Transfer Grace period displays as TRANSFERPERIOD in WHOIS and is set to five calendar days after the successful transfer of domain name registration from one registrar to another registrar.

Transfers under Part A of the ICANN Policy on Transfer of Registrations between registrars may not occur during the TRANSFERPERIOD or within the first 60 days after the transfer. If a Delete or Renew/Extend occurs within that five calendar days, the following rules apply:

- i. Delete. If the domain is deleted by the new sponsoring registrar during this period, the registry provides a credit to the registrar for the cost of the transfer. The domain then moves into the Redemption Grace Period with a status of PENDING DELETE RESTORABLE.
- ii. Renew/Extend. If a domain registration is renewed within the Transfer Grace Period, there is no credit for the transfer. The registrar's account will be charged for the number of years the registration is renewed. The expiration date of the domain registration is extended by the renewal years as long as the total term does not exceed 10 years.

Special considerations

For any community TLD with a domain challenge process note the process is described in 20(e). Else, delete.

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For TLD with auctions: This TLD will conduct an auction for certain domain names. Afiliias will manage the domain name auction using existing technology. Upon the completion of the auction, any domain name acquired will then follow the standard lifecycle of a domain.

Registration lifecycle resources

Since its founding, Afiliias is focused on delivering secure, stable and reliable registry services. Several essential management and staff who designed and launched the Afiliias registry in 2001 and expanded the number of TLDs supported, all while maintaining strict service levels over the past decade, are still in place today. This experiential continuity will endure for the implementation and on-going maintenance of this TLD. Afiliias operates in a matrix structure, which allows its staff to be allocated to various critical functions in both a dedicated and a shared manner. With a team of specialists and generalists, the Afiliias project management methodology allows efficient and effective use of our staff in a focused way. Virtually all Afiliias resource are involved in the registration lifecycle of domains.

There are a few areas where registry staff devote resources to registration lifecycle issues:

- a. Supporting Registrar Transfer Disputes. The registry operator will have a compliance staffer handle these disputes as they arise; they are very rare in the existing gTLDs.
- b. Afiliias has its development and quality assurance departments on hand to modify the grace period functionality as needed, if ICANN issues new Consensus Policies or the RFCs change.

Afiliias has more than 30 staff members in these departments.

28. Abuse Prevention and Mitigation

The registry operator, working with Afiliias, will take the requisite operational and technical steps to promote WHOIS data accuracy, limit domain abuse, remove outdated and inaccurate data, and other security measures to ensure the integrity of the TLD. The specific measures include, but are not limited to:

- Posting a TLD Anti-Abuse Policy that clearly defines abuse, and provide point-of-contact information for reporting suspected abuse;
- Committing to rapid identification and resolution of abuse, including suspensions;
- Ensuring completeness of WHOIS information at the time of registration;
- Publishing and maintaining procedures for removing orphan glue records for names removed from the zone, and;
- Establishing measures to deter WHOIS abuse, including rate-limiting, determining data syntax validity, and implementing and enforcing requirements from the Registry-Registrar Agreement.

Abuse policy

The Anti-Abuse Policy stated below will be enacted under the contractual authority of the registry operator through the Registry-Registrar Agreement, and the obligations will be passed on to and made binding upon registrants. This policy will be posted on the TLD web site along with contact information for registrants or users to report suspected abuse.

The policy is designed to address the malicious use of domain names. The registry operator and its registrars will make reasonable attempts to limit significant harm to Internet users. This policy is not intended to take the place of the Uniform Domain Name Dispute Resolution Policy (UDRP) or the Uniform Rapid Suspension System (URS), and it is not to be used as an alternate form of dispute resolution or as a brand protection mechanism. Its intent is not to burden law-abiding or innocent registrants and domain users; rather, the intent is to deter those who use domain names maliciously by engaging in illegal or fraudulent activity.

Repeat violations of the abuse policy will result in a case-by-case review of the abuser(s), and the registry operator reserves the right to escalate the issue, with the intent of levying sanctions that are allowed under the TLD anti-abuse policy.

The below policy is a recent version of the policy that has been used by the .INFO registry since 2008, and the .ORG registry since 2009. It has proven to be an effective and flexible tool. Though the final process of protecting against abuse may differ in some elements, the intent, issues addressed and level of care will be similar to the outline below.

.TLD Anti-Abuse Policy

The following Anti-Abuse Policy is effective upon launch of the TLD. Malicious use of domain names will not be tolerated. The nature of such abuses creates security and stability issues for the registry, registrars, and registrants, as well as for users of the Internet in general. The registry operator definition of abusive use of a domain includes, without limitation, the following:

- Illegal or fraudulent actions;
- Spam: The use of electronic messaging systems to send unsolicited bulk messages. The term applies to email spam and similar abuses such as instant messaging spam, mobile messaging spam, and the spamming of web sites and Internet forums;
- Phishing: The use of counterfeit web pages that are designed to trick recipients into divulging sensitive data such as personally identifying information, usernames, passwords, or financial data;
- Pharming: The redirecting of unknowing users to fraudulent sites or services, typically through, but not limited to, DNS hijacking or poisoning;
- Willful distribution of malware: The dissemination of software designed to infiltrate or damage a computer system without the owner's informed consent. Examples include, without limitation, computer viruses, worms, keyloggers, and Trojan horses.
- Malicious fast-flux hosting: Use of fast-flux techniques with a botnet to disguise the location of web sites or other Internet services, or to avoid detection and mitigation efforts, or to host illegal activities.
- Botnet command and control: Services run on a domain name that are used to control a collection of compromised computers or "zombies," or to direct distributed denial-of-service attacks (DDoS attacks);
- Illegal Access to Other Computers or Networks: Illegally accessing computers, accounts, or networks belonging to another party, or attempting to penetrate security measures of another individual's system (often known as "hacking"). Also, any activity that might be used as a precursor to an attempted system penetration (e.g., port scan, stealth scan, or other information gathering activity).

Pursuant to the Registry-Registrar Agreement, registry operator reserves the right at its sole discretion to deny, cancel, or transfer any registration or transaction, or place any domain name(s) on registry lock, hold, or similar status, that it deems necessary: (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of registry operator, as well as its affiliates, subsidiaries, officers, directors, and employees; (4) per the terms of the registration agreement and this Anti-Abuse Policy, or (5) to correct mistakes made by registry operator or any registrar in connection with a domain name registration. Registry operator also reserves the right to place upon registry lock, hold, or similar status a domain name during resolution of a dispute.

The policy stated above will be accompanied by notes about how to submit a report to the registry operator's abuse point of contact, and how to report an orphan glue record suspected of being used in connection with malicious conduct (see below).

Abuse point of contact and procedures for handling abuse complaints

The registry operator will establish an abuse point of contact. This contact will be a role-based e-mail address of the form "abuse@registry.TLD". This e-mail address will allow multiple staff members to monitor abuse reports on a 24x7 basis, and then work toward closure of cases as each situation calls for. For tracking purposes, the registry operator will have a ticketing system with which all complaints will be tracked internally. The reporter will be provided with the ticket reference identifier for potential follow-up. Afiliias will integrate its existing ticketing system with the registry operator's to ensure uniform tracking and handling of the complaint. This role-based approach has been used successfully by ISPs, e-mail service providers, and registrars for many years, and is considered a global best practice.

The registry operator's designated abuse handlers will then evaluate complaints received via the abuse system address. They will decide whether a particular issue is of concern, and decide what action, if any, is appropriate.

In general, the registry operator will find itself receiving abuse reports from a wide variety of parties, including security researchers and Internet security companies, financial institutions such as banks, Internet users, and law enforcement agencies among others. Some of these parties may provide good forensic data or supporting evidence of the malicious behavior. In other cases, the party reporting an issue may not be familiar with how to provide such data or proof of malicious behavior. It is expected that a percentage of abuse reports to the registry operator will not be actionable, because there will not be enough evidence to support the complaint (even after investigation), and because some reports or reporters will simply not be credible.

The security function includes a communication and outreach function, with information sharing with industry partners regarding malicious or abusive behavior, in order to ensure coordinated abuse mitigation across multiple TLDs.

Assessing abuse reports requires great care, and the registry operator will rely upon professional, trained investigators who are versed in such matters. The goals are accuracy, good record-keeping, and a zero false-positive rate so as not to harm innocent registrants.

Different types of malicious activities require different methods of investigation and documentation. Further, the registry operator expects to face unexpected or complex situations that call for professional advice, and will rely upon professional, trained investigators as needed.

In general, there are two types of domain abuse that must be addressed:

- a) Compromised domains. These domains have been hacked or otherwise compromised by criminals, and the registrant is not responsible for the malicious activity taking place on the domain. For example, the majority of domain names that host phishing sites are compromised. The goal in such cases is to get word to the registrant (usually via the registrar) that there is a problem that needs attention with the expectation that the registrant will address the problem in a timely manner. Ideally such domains do not get suspended, since suspension would disrupt legitimate activity on the domain.
- b) Malicious registrations. These domains are registered by malefactors for the purpose of abuse. Such domains are generally targets for suspension, since they have no legitimate use.

The standard procedure is that the registry operator will forward a credible alleged case of malicious domain name use to the domain's sponsoring registrar with a request that the registrar investigate the case and act appropriately. The registrar will be provided evidence collected as a result of the investigation conducted by the trained abuse handlers. As part of the investigation, if inaccurate or false WHOIS registrant information is detected, the registrar is notified about this. The registrar is the party with a direct relationship with-and a direct contract with-the registrant. The registrar will also have vital information that the registry operator will not, such as:

- Details about the domain purchase, such as the payment method used (credit card, PayPal, etc.);
- The identity of a proxy-protected registrant;
- The purchaser's IP address;
- Whether there is a reseller involved, and;
- The registrant's past sales history and purchases in other TLDs (insofar as the registrar can determine this).

Registrars do not share the above information with registry operators due to privacy and liability concerns, among others. Because they have more information with which to continue the investigation, and because they have a direct relationship with the registrant, the registrar is in the best position to evaluate alleged abuse. The registrar can determine if the use violates the registrar's legal terms of service or the registry Anti-Abuse Policy, and can decide whether or not to take any action. While the language and terms vary, registrars will be expected to include language in their registrar-registrant contracts that indemnifies the registrar if it takes action, and allows the registrar to suspend or cancel a domain name; this will be in addition to the registry Anti-Abuse Policy. Generally, registrars can act if the registrant violates the registrar's terms of service, or violates ICANN policy, or if illegal activity is involved, or if the use violates the registry's Anti-Abuse Policy.

If a registrar does not take action within a time period indicated by the registry operator (usually 24 hours), the registry operator might then decide to take action itself. At all times, the registry operator reserves the right to act directly and immediately if the potential harm to Internet users seems significant or imminent, with or without notice to the sponsoring registrar.

The registry operator will be prepared to call upon relevant law enforcement bodies as needed. There are certain cases, for example, Illegal pharmacy domains, where the registry operator will contact the Law Enforcement Agencies to share information about these domains, provide all the evidence collected and work closely with them before any action will be taken for suspension. The specific action is often dependent upon the jurisdiction of which the registry operator, although the operator in all cases will adhere to applicable laws and regulations.

When valid court orders or seizure warrants are received from courts or law enforcement agencies of relevant jurisdiction, the registry operator will order execution in an expedited fashion. Compliance with these will be a top priority and will be completed as soon as possible and within the defined timelines of the order. There are certain cases where Law Enforcement Agencies request information

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about a domain including but not limited to:

- Registration information
- History of a domain, including recent updates made
- Other domains associated with a registrant's account
- Patterns of registrant portfolio

Requests for such information is handled on a priority basis and sent back to the requestor as soon as possible. Afiliias sets a goal to respond to such requests within 24 hours.

The registry operator may also engage in proactive screening of its zone for malicious use of the domains in the TLD, and report problems to the sponsoring registrars. The registry operator could take advantage of a combination of the following resources, among others:

- Blocklists of domain names and nameservers published by organizations such as SURBL and Spamhaus.
- Anti-phishing feeds, which will provide URLs of compromised and maliciously registered domains being used for phishing.
- Analysis of registration or DNS query data [DNS query data received by the TLD nameservers.]

The registry operator will keep records and track metrics regarding abuse and abuse reports. These will include:

- Number of abuse reports received by the registry's abuse point of contact described above;
- Number of cases and domains referred to registrars for resolution;
- Number of cases and domains where the registry took direct action;
- Resolution times;
- Number of domains in the TLD that have been blacklisted by major anti-spam blocklist providers, and;
- Phishing site uptimes in the TLD.

Removal of orphan glue records

By definition, orphan glue records used to be glue records. Glue records are related to delegations and are necessary to guide iterative resolvers to delegated nameservers. A glue record becomes an orphan when its parent nameserver record is removed without also removing the corresponding glue record. (Please reference the ICANN SSAC paper SAC048 at:

<http://www.icann.org/en/committees/security/sac048.pdf>.) Orphan glue records may be created when a domain (example.tld) is placed on EPP ServerHold or ClientHold status. When placed on Hold, the domain is removed from the zone and will stop resolving. However, any child nameservers (now orphan glue) of that domain (e.g., ns1.example.tld) are left in the zone. It is important to keep these orphan glue records in the zone so that any innocent sites using that nameserver will continue to resolve. This use of Hold status is an essential tool for suspending malicious domains.

Afiliias observes the following procedures, which are being followed by other registries and are generally accepted as DNS best practices. These procedures are also in keeping with ICANN SSAC recommendations.

When a request to delete a domain is received from a registrar, the registry first checks for the existence of glue records. If glue records exist, the registry will check to see if other domains in the registry are using the glue records. If other domains in the registry are using the glue records then the request to delete the domain will fail until no other domains are using the glue records. If no other domains in the registry are using the glue records then the glue records will be removed before the request to delete the domain is satisfied. If no glue records exist then the request to delete the domain will be satisfied.

If a registrar cannot delete a domain because of the existence of glue records that are being used by other domains, then the registrar may refer to the zone file or the "weekly domain hosted by nameserver report" to find out which domains are using the nameserver in question and attempt to contact the corresponding registrar to request that they stop using the nameserver in the glue record. The registry operator does not plan on performing mass updates of the associated DNS records.

The registry operator will accept, evaluate, and respond appropriately to complaints that orphan glue is being used maliciously. Such reports should be made in writing to the registry operator, and may be submitted to the registry's abuse point-of-contact. If it is confirmed that an orphan glue record is being used in connection with malicious conduct, the registry operator will have the orphan glue record removed from the zone file. Afiliias has the technical ability to execute such requests as needed.

Methods to promote WHOIS accuracy

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The creation and maintenance of accurate WHOIS records is an important part of registry management. As described in our response to question #26, WHOIS, the registry operator will manage a secure, robust and searchable WHOIS service for this TLD.

WHOIS data accuracy

The registry operator will offer a "thick" registry system. In this model, all key contact details for each domain name will be stored in a central location by the registry. This allows better access to domain data, and provides uniformity in storing the information. The registry operator will ensure that the required fields for WHOIS data (as per the defined policies for the TLD) are enforced at the registry level. This ensures that the registrars are providing required domain registration data. Fields defined by the registry policy to be mandatory are documented as such and must be submitted by registrars. The Afiliias registry system verifies formats for relevant individual data fields (e.g. e-mail, and phone/fax numbers). Only valid country codes are allowed as defined by the ISO 3166 code list. The Afiliias WHOIS system is extensible, and is capable of using the VAULT system, described further below.

Similar to the centralized abuse point of contact described above, the registry operator can institute a contact email address which could be utilized by third parties to submit complaints for inaccurate or false WHOIS data detected. This information will be processed by Afiliias' support department and forwarded to the registrars. The registrars can work with the registrants of those domains to address these complaints. Afiliias will audit registrars on a yearly basis to verify whether the complaints being forwarded are being addressed or not. This functionality, available to all registry operators, is activated based on the registry operator's business policy.

Afiliias also incorporates a spot-check verification system where a randomly selected set of domain names are checked periodically for accuracy of WHOIS data. Afiliias' .PRO registry system incorporates such a verification system whereby 1% of total registrations or 100 domains, whichever number is larger, are spot-checked every month to verify the domain name registrant's critical information provided with the domain registration data. With both a highly qualified corps of engineers and a 24x7 staffed support function, Afiliias has the capacity to integrate such spot-check functionality into this TLD, based on the registry operator's business policy. Note: This functionality will not work for proxy protected WHOIS information, where registrars or their resellers have the actual registrant data. The solution to that problem lies with either registry or registrar policy, or a change in the general marketplace practices with respect to proxy registrations.

Finally, Afiliias' registry systems have a sophisticated set of billing and pricing functionality which aids registry operators who decide to provide a set of financial incentives to registrars for maintaining or improving WHOIS accuracy. For instance, it is conceivable that the registry operator may decide to provide a discount for the domain registration or renewal fees for validated registrants, or levy a larger cost for the domain registration or renewal of proxy domain names. The Afiliias system has the capability to support such incentives on a configurable basis, towards the goal of promoting better WHOIS accuracy.

Role of registrars

As part of the RRA (Registry Registrar Agreement), the registry operator will require the registrar to be responsible for ensuring the input of accurate WHOIS data by their registrants. The Registrar/Registered Name Holder Agreement will include a specific clause to ensure accuracy of WHOIS data, and to give the registrar rights to cancel or suspend registrations if the Registered Name Holder fails to respond to the registrar's query regarding accuracy of data. ICANN's WHOIS Data Problem Reporting System (WDPRS) will be available to those who wish to file WHOIS inaccuracy reports, as per ICANN policy (<http://wdprs.internic.net/>).

Controls to ensure proper access to domain functions

Several measures are in place in the Afiliias registry system to ensure proper access to domain functions, including authentication provisions in the RRA relative to notification and contact updates via use of AUTH-INFO codes.

IP address access control lists, TLS/SSL certificates and proper authentication are used to control access to the registry system. Registrars are only given access to perform operations on the objects they sponsor.

Every domain will have a unique AUTH-INFO code. The AUTH-INFO code is a 6- to 16-character code assigned by the registrar at the time the name is created. Its purpose is to aid identification of the domain owner so proper authority can be established. It is the "password" to the domain name. Registrars must use the domain's password in order to initiate a registrar-to-registrar transfer. It

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is used to ensure that domain updates (update contact information, transfer, or deletion) are undertaken by the proper registrant, and that this registrant is adequately notified of domain update activity. Only the sponsoring registrar of a domain has access to the domain's AUTH-INFO code stored in the registry, and this is accessible only via encrypted, password-protected channels.

Information about other registry security measures such as encryption and security of registrar channels are confidential to ensure the security of the registry system. The details can be found in the response to question #30b.

Validation and abuse mitigation mechanisms

Afilias has developed advanced validation and abuse mitigation mechanisms. These capabilities and mechanisms are described below. These services and capabilities are discretionary and may be utilized by the registry operator based on their policy and business need.

Afilias has the ability to analyze the registration data for known patterns at the time of registration. A database of these known patterns is developed from domains and other associated objects (e.g., contact information) which have been previously detected and suspended after being flagged as abusive. Any domains matching the defined criteria can be flagged for investigation. Once analyzed and confirmed by the domain anti-abuse team members, these domains may be suspended. This provides proactive detection of abusive domains.

Provisions are available to enable the registry operator to only allow registrations by pre-authorized and verified contacts. These verified contacts are given a unique code that can be used for registration of new domains.

Registrant pre-verification and authentication

One of the systems that could be used for validity and identity authentication is VAULT (Validation and Authentication Universal Lookup). It utilizes information obtained from a series of trusted data sources with access to billions of records containing data about individuals for the purpose of providing independent age and id verification as well as the ability to incorporate additional public or private data sources as required. At present it has the following: US Residential Coverage - 90% of Adult Population and also International Coverage - Varies from Country to Country with a minimum of 80% coverage (24 countries, mostly European).

Various verification elements can be used. Examples might include applicant data such as name, address, phone, etc. Multiple methods could be used for verification include integrated solutions utilizing API (XML Application Programming Interface) or sending batches of requests.

- Verification and Authentication requirements would be based on TLD operator requirements or specific criteria.
- Based on required WHOIS Data; registrant contact details (name, address, phone)
- If address/ZIP can be validated by VAULT, the validation process can continue (North America +25 International countries)
- If in-line processing and registration and EPP/API call would go to the verification clearinghouse and return up to 4 challenge questions.
- If two-step registration is required, then registrants would get a link to complete the verification at a separate time. The link could be specific to a domain registration and pre-populated with data about the registrant.
- If WHOIS data is validated a token would be generated and could be given back to the registrar which registered the domain.
- WHOIS data would reflect the Validated Data or some subset, i.e., fields displayed could be first initial and last name, country of registrant and date validated. Other fields could be generic validation fields much like a "privacy service".
- A "Validation Icon" customized script would be sent to the registrants email address. This could be displayed on the website and would be dynamically generated to avoid unauthorized use of the Icon. When clicked on the Icon would should limited WHOIS details i.e. Registrant: jdoe, Country: USA, Date Validated: March 29, 2011, as well as legal disclaimers.
- Validation would be annually renewed, and validation date displayed in the WHOIS.

Abuse prevention resourcing plans

Since its founding, Afilias is focused on delivering secure, stable and reliable registry services. Several essential management and staff who designed and launched the Afilias registry in 2001 and expanded the number of TLDs supported, all while maintaining strict service levels over the past decade, are still in place today. This experiential continuity will endure for the implementation and

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on-going maintenance of this TLD. Afiliias operates in a matrix structure, which allows its staff to be allocated to various critical functions in both a dedicated and a shared manner. With a team of specialists and generalists, the Afiliias project management methodology allows efficient and effective use of our staff in a focused way. Abuse prevention and detection is a function that is staffed across the various groups inside Afiliias, and requires a team effort when abuse is either well hidden or widespread, or both. While all of Afiliias' 200+ employees are charged with responsibility to report any detected abuse, the engineering and analysis teams, numbering over 30, provide specific support based on the type of abuse and volume and frequency of analysis required. The Afiliias security and support teams have the authority to initiate mitigation.

Afiliias has developed advanced validation and abuse mitigation mechanisms. These capabilities and mechanisms are described below. These services and capabilities are discretionary and may be utilized by the registry operator based on their policy and business need.

This TLD's anticipated volume of registrations in the first three years of operations is listed in response #46. Afiliias and the registry operator's anti-abuse function anticipates the expected volume and type of registrations, and together will adequately cover the staffing needs for this TLD. The registry operator will maintain an abuse response team, which may be a combination of internal staff and outside specialty contractors, adjusting to the needs of the size and type of TLD. The team structure planned for this TLD is based on several years of experience responding to, mitigating, and managing abuse for TLDs of various sizes. The team will generally consist of abuse handlers (probably internal), a junior analyst, (either internal or external), and a senior security consultant (likely an external resource providing the registry operator with extra expertise as needed). These responders will be specially trained in the investigation of abuse complaints, and will have the latitude to act expeditiously to suspend domain names (or apply other remedies) when called for.

The exact resources required to maintain an abuse response team must change with the size and registration procedures of the TLD. An initial abuse handler is necessary as a point of contact for reports, even if a part-time responsibility. The abuse handlers monitor the abuse email address for complaints and evaluate incoming reports from a variety of sources. A large percentage of abuse reports to the registry operator may be unsolicited commercial email. The designated abuse handlers can identify legitimate reports and then decide what action is appropriate, either to act upon them, escalate to a security analyst for closer investigation, or refer them to registrars as per the above-described procedures. A TLD with rare cases of abuse would conform to this structure.

If multiple cases of abuse within the same week occur regularly, the registry operator will consider staffing internally a security analyst to investigate the complaints as they become more frequent. Training an abuse analyst requires 3-6 months and likely requires the active guidance of an experienced senior security analyst for guidance and verification of assessments and recommendations being made.

If this TLD were to regularly experience multiple cases of abuse within the same day, a full-time senior security analyst would likely be necessary. A senior security analyst capable of fulfilling this role should have several years of experience and able to manage and train the internal abuse response team.

The abuse response team will also maintain subscriptions for several security information services, including the blocklists from organizations like SURBL and Spamhaus and anti-phishing and other domain related abuse (malware, fast-flux etc.) feeds. The pricing structure of these services may depend on the size of the domain and some services will include a number of rapid suspension requests for use as needed.

For a large TLD, regular audits of the registry data are required to maintain control over abusive registrations. When a registrar with a significant number of registrations has been compromised or acted maliciously, the registry operator may need to analyze a set of registration or DNS query data. A scan of all the domains of a registrar is conducted only as needed. Scanning and analysis for a large registrar may require as much as a week of full-time effort for a dedicated machine and team.

29. Rights Protection Mechanisms

Rights protection is a core responsibility of the TLD operator, and is supported by a fully-developed plan for rights protection that includes:

- Establishing mechanisms to prevent unqualified registrations (e.g., registrations made in violation

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of the registry's eligibility restrictions or policies);

- Implementing a robust Sunrise program, utilizing the Trademark Clearinghouse, the services of one of ICANN's approved dispute resolution providers, a trademark validation agent, and drawing upon sunrise policies and rules used successfully in previous gTLD launches;
- Implementing a professional trademark claims program that utilizes the Trademark Clearinghouse, and drawing upon models of similar programs used successfully in previous TLD launches;
- Complying with the URS requirements;
- Complying with the UDRP;
- Complying with the PDDRP, and;
- Including all ICANN-mandated and independently developed rights protection mechanisms ("RPMs") in the registry-registrar agreement entered into by ICANN-accredited registrars authorized to register names in the TLD.

The response below details the rights protection mechanisms at the launch of the TLD (Sunrise and Trademark Claims Service) which comply with rights protection policies (URS, UDRP, PDDRP, and other ICANN RPMs), outlines additional provisions made for rights protection, and provides the resourcing plans.

Safeguards for rights protection at the launch of the TLD

The launch of this TLD will include the operation of a trademark claims service according to the defined ICANN processes for checking a registration request and alerting trademark holders of potential rights infringement.

The Sunrise Period will be an exclusive period of time, prior to the opening of public registration, when trademark holders will be able to reserve eligible marks that correspond with domain name. Following the Sunrise Period, registration will open to qualified applicants.

Afiilas will support handling data from the outcomes of the sunrise and land-rush periods.

The Registry intends to offer the following launch model.

Certain names will be RESERVED NAMES.

Sunrise A	(favouring trademarks of the countries of the GCC)
Sunrise B	(favouring trademarks generally)
Sunrise C	(favouring entities operating in countries of the GCC)
Landrush	(seeking to sell premium names)
General Availability	(steady state pricing)

Sunrise

The Sunrise process is separated into three phases:

- Sunrise A allows eligible trademark owners to obtain domains corresponding to trademarks registered in the COUNTRIES OF THE GCC.
- Sunrise B allows eligible trademark owners to obtain domains corresponding to the trademarks they own.
- Sunrise C allows the COMPETENT AUTHORITY (such as government or local government or equivalent) or the ELIGIBLE SUNRISE C OWNER to obtain domains corresponding to entities or individuals associated with the COUNTRIES OF THE GCC.

There is no priority during the Sunrise periods. A batching system is used for identical competing applications which are then allocated by auction.

The Registry will publish full details of its Sunrise policy and eligibility. What follows is an outline of the policy with some key definitions.

To be eligible to submit a REGISTRATION REQUEST under Sunrise, a Sunrise APPLICANT must:

- (a) comply with the relevant SUNRISE ELIGIBILITY REQUIREMENTS; and
- (b) be related to the POLICY of the REGISTRY; and
- (c) AFFIRM COMPLIANCE with the POLICY of the REGISTRY.

Sunrise definitions

The policy will be based inter alia upon the following key definitions.

COMPETENT AUTHORITY.

An APPLICANT who is the competent authority (such as government, local government or equivalent) of the relevant entity associated with the COUNTRIES OF THE GCC.

COUNTRIES OF THE GCC

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Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, United Arab Emirates.

ELIGIBLE SUNRISE C OWNER

This is a broad list that will be published by the Registry after delegation and includes non-exhaustively: government and local government entities, businesses, not for profits, non-governmental organisations, eminent individuals, clubs and societies.

OWNERSHIP.

Ownership of an eligible trademark may mean owner, co-owner or assignee.

For an assignee, the PROVIDER may request appropriate evidence that the assignment has taken place, and meets the legal requirements to be an effective assignment in the jurisdiction in which the mark is registered.

For a co-owner, the PROVIDER may request appropriate evidence that the co-owners have joined in the application.

Any dispute will be decided upon by the PROVIDER.

PROVIDER.

An independent entity or entities appointed by the Registry to provide certain rights protection services which may include inter alia verification, validation, and dispute resolution related to eligibility of trademarks.

REGISTRATION REQUEST.

An application submitted by an ACCREDITED REGISTRAR on behalf of an APPLICANT to register a name in the TLD.

RESERVED NAME

A Registration Request that is a match with the names listed in the ".GCC Reserve List" being a listing of geographical and other names related to the public sector or other entities or individuals related to the policy of the Registry. Reserved names may be released by the Registry according to the rules of the Reserved Name Release Policy, which will be published after delegation.

SUNRISE DISPUTE RESOLUTION POLICY.

The REGISTRY will operate a Sunrise Dispute Resolution Policy either itself or via the PROVIDER full details and the fees for which will be published on the REGISTRY WEBSITE.

The policy will allow challenges based on the following grounds:

(a) at the time the challenged domain name was registered, the domain name REGISTRANT did not hold an ELIGIBLE trademark;

(b) the trademark registration or other grounds on which the domain name REGISTRANT based its Sunrise registration is not ELIGIBLE;

(c) the domain name is not identical to the trademark or entity on which the domain name REGISTRANT based its Sunrise registration;

(d) the REGISTRATION REQUEST which led to the award of the domain name was in some way incorrect, misleading or fraudulent.

SUNRISE A ELIGIBILITY REQUIREMENTS.

These are cumulative.

(a) OWNERSHIP of a word mark of national effect registered in one of the COUNTRIES OF THE GCC;

(b - n) of the SUNRISE B ELIGIBILITY REQUIREMENTS;

(m) is not a match to a RESERVED NAME.

SUNRISE B ELIGIBILITY REQUIREMENTS.

These are cumulative.

(a) OWNERSHIP of a word mark registered in the Trademark Clearinghouse;

OR OWNERSHIP of a word mark of national or regional or international effect registered in one of the states or entities in the WIPO Standard ST.3, that is in full force and effect at the time of submission of the REGISTRATION REQUEST, and at the time of Registration of any awarded name, and for which acceptable evidence of USE in the class for which it is registered is provided;

OR OWNERSHIP of a word mark that has been court-validated;

OR OWNERSHIP of a word mark that is specifically protected by a statute or treaty currently in effect

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and that was in effect on or before 26 June 2008;

(b) a word mark which directly corresponds to the name in the REGISTRATION REQUEST;

(c) a statutory declaration or an affidavit signed by the APPLICANT:

(i) that the information provided is true, correct and complete;

(ii) that no pertinent information has been withheld;

(iii) that acknowledges the fact that if there is any information withheld, that it automatically results in the loss of rights in any domain name(s) acquired, or the loss of the right to seek to register same;

(iv) that the application is compliant with the relevant Sunrise requirements;

(d) provision of data conforming to the SUNRISE INFORMATION REQUIREMENTS sufficient to document rights in the trademark;

(e) is not a word mark that includes the STRING as a portion of the trademark;

(f) is not a trademark for which an application for registration has been filed, but is not actually registered;

(g) is not a trademark for which an application has lapsed, been withdrawn, revoked, or cancelled;

(h) is not an unregistered trademark including such common law marks;

(i) is not a U.S. state trademark or service mark or a U.S. supplemental registration;

(j) is not an international application for the registration of trademarks, made through the Madrid system, unless based on or have resulted in a registered trademark of national effect;

(k) is not intellectual property other than a word mark such as rights in a sign or name, including domain names, trade names, and appellations of origin.

(l) is not a trademark registration that came into full effect after the effective date of the Registry Agreement;

(m) is not a trademark registration that was applied for after the 1 May 2012.

(n) is not a trademark that matches a RESERVED NAME.

One key objective of the SERs is to facilitate marks registered and used in good faith and not merely as a means to register a domain name.

SUNRISE C ELIGIBILITY REQUIREMENTS.

These are cumulative.

(a) the COMPETENT AUTHORITY for, or the ELIGIBLE SUNRISE C OWNER of, an entity associated with the COUNTRIES OF THE GCC;

(b) provision of data sufficient to document the competence of the authority or the eligibility of the owner;

(c) is not a match to a RESERVED NAME.

SUNRISE INFORMATION REQUIREMENTS.

APPLICANTS in Sunrise A and B must submit the following information, either in an ACCEPTABLE ELECTRONIC FORMAT or via a link to the relevant database of the trademark registry, as part of a REGISTRATION REQUEST:

EITHER 1: the Trademark name and its corresponding Trademark Clearing House identity number;

OR 2 all of the following:

(a) the trademark corresponding to the name to be Registered;

(b) the country, region, or organization found in WIPO STANDARD ST.3 in which the trademark is registered;

(c) the current registration number of the trademark;

(d) the date on which the trademark application was submitted

(e) the date on which the trademark was registered;

(f) the class or classes under the latest publication of the Nice system (or its equivalent) for with

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the trademark is registered; and
 (g) the status of the APPLICANT being one of owner, co-owner, or assignee of the trademark.

USE. Acceptable evidence of use will be a signed declaration and a single specimen of current use, which might consist of labels, tags, containers, advertising, brochures, screen shots, or something else that evidences current use in the relevant jurisdiction, provided in an ACCEPTABLE ELECTRONIC FORMAT.

The form of the signed declaration will be as follows.

"I/We [name of applicant] declare that I/we have used the trademark [name of work mark] since [date] in [country] on [state goods or services] and attach a sample of [type of sample] as evidence."

Ongoing rights protection mechanisms

Several mechanisms will be in place to protect rights in this TLD. As described in our responses to questions #27 and #28, measures are in place to ensure domain transfers and updates are only initiated by the appropriate domain holder, and an experienced team is available to respond to legal actions by law enforcement or court orders.

This TLD will conform to all ICANN RPMs including URS (defined below), UDRP, PDDRP, and all measures defined in Specification 7 of the new TLD agreement.

Uniform Rapid Suspension (URS)

The registry operator will implement decisions rendered under the URS on an ongoing basis. Per the URS policy posted on ICANN's Web site as of this writing, the registry operator will receive notice of URS actions from the ICANN-approved URS providers. These emails will be directed immediately to the registry operator's support staff, which is on duty 24x7. The support staff will be responsible for creating a ticket for each case, and for executing the directives from the URS provider. All support staff will receive pertinent training.

As per ICANN's URS guidelines, within 24 hours of receipt of the notice of complaint from the URS provider, the registry operator shall "lock" the domain, meaning the registry shall restrict all changes to the registration data, including transfer and deletion of the domain names, but the name will remain in the TLD DNS zone file and will thus continue to resolve. The support staff will "lock" the domain by associating the following EPP statuses with the domain and relevant contact objects:

- ServerUpdateProhibited, with an EPP reason code of "URS"
- ServerDeleteProhibited, with an EPP reason code of "URS"
- ServerTransferProhibited, with an EPP reason code of "URS"
- The registry operator's support staff will then notify the URS provider immediately upon locking the domain name, via email.

The registry operator's support staff will retain all copies of emails from the URS providers, assign them a tracking or ticket number, and will track the status of each opened URS case through to resolution via spreadsheet or database.

The registry operator's support staff will execute further operations upon notice from the URS providers. The URS provider is required to specify the remedy and required actions of the registry operator, with notification to the registrant, the complainant, and the registrar.

As per the URS guidelines, if the complainant prevails, the "registry operator shall suspend the domain name, which shall remain suspended for the balance of the registration period and would not resolve to the original web site. The nameservers shall be redirected to an informational web page provided by the URS provider about the URS. The WHOIS for the domain name shall continue to display all of the information of the original registrant except for the redirection of the nameservers. In addition, the WHOIS shall reflect that the domain name will not be able to be transferred, deleted or modified for the life of the registration."

Community TLD considerations

This is not a Community TLD.

Rights protection via the RRA

The following will be memorialized and be made binding via the Registry-Registrar and Registrar-Registrant Agreements:

- The registry may reject a registration request or a reservation request, or may delete, revoke, suspend, cancel, or transfer a registration or reservation under the following criteria:

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- a. to enforce registry policies and ICANN requirements; each as amended from time to time;
- b. that is not accompanied by complete and accurate information as required by ICANN requirements and/or registry policies or where required information is not updated and/or corrected as required by ICANN requirements and/or registry policies;
- c. to protect the integrity and stability of the registry, its operations, and the TLD system;
- d. to comply with any applicable law, regulation, holding, order, or decision issued by a court, administrative authority, or dispute resolution service provider with jurisdiction over the registry;
- e. to establish, assert, or defend the legal rights of the registry or a third party or to avoid any civil or criminal liability on the part of the registry and/or its affiliates, subsidiaries, officers, directors, representatives, employees, contractors, and stockholders;
- f. to correct mistakes made by the registry or any accredited registrar in connection with a registration; or
- g. as otherwise provided in the Registry-Registrar Agreement and/or the Registrar-Registrant Agreement.

Reducing opportunities for behaviors such as phishing or pharming

In our response to question #28, the registry operator has described its anti-abuse program. Rather than repeating the policies and procedures here, please see our response to question #28 for full details.

With specific respect to phishing and pharming, it should be noted by ICANN that this will be a single entity TLD in which the Applicant has direct control over each registrant (they are typically on staff or otherwise contractually bound) and how each registration may be used. Further, there will be no open registration period for this TLD, as it will never be an "open" TLD. Since all criminal activity (such as phishing and pharming) is precluded by the mission, values and policies of the registry operator (and its parent organization), criminal activity is not expected to be a problem. If such activity occurs due to hacking or other compromises, the registry operator will take prompt and effective steps to eliminate the activity.

In the case of this TLD, the Applicant will apply an approach that addresses registered domain names (rather than potentially registered domains). This approach will not infringe upon the rights of eligible registrants to register domains, and allows the Applicant internal controls, as well as community-developed UDRP and URS policies and procedures if needed, to deal with complaints, should there be any.

Afilias is a member of various security fora which provide access to lists of names in each TLD which may be used for malicious purposes. Such identified names will be subject to the TLD anti-abuse policy, including rapid suspensions after due process.

Rights protection resourcing plans

Since its founding, Afilias is focused on delivering secure, stable and reliable registry services. Several essential management and staff who designed and launched the Afilias registry in 2001 and expanded the number of TLDs supported, all while maintaining strict service levels over the past decade, are still in place today. This experiential continuity will endure for the implementation and on-going maintenance of this TLD. Afilias operates in a matrix structure, which allows its staff to be allocated to various critical functions in both a dedicated and a shared manner. With a team of specialists and generalists, the Afilias project management methodology allows efficient and effective use of our staff in a focused way.

Supporting RPMs requires several departments within the registry operator as well as within Afilias. The implementation of Sunrise and the Trademark Claims service and on-going RPM activities will pull from the 102 Afilias staff members of the engineering, product management, development, security and policy teams at Afilias and the support staff of the registry operator, which is on duty 24x7. A trademark validator will also be assigned within the registry operator, whose responsibilities may require as much as 50% of full-time employment if the domains under management were to exceed several million. No additional hardware or software resources are required to support this as Afilias has fully-operational capabilities to manage abuse today.

30(a). Security Policy: Summary of the security policy for the proposed registry

The answer to question #30a is provided by Afilias, the back-end provider of registry services for this TLD.

Afilias aggressively and actively protects the registry system from known threats and vulnerabilities, and has deployed an extensive set of security protocols, policies and procedures to thwart compromise. Afilias' robust and detailed plans are continually updated and tested to ensure new threats are mitigated prior to becoming issues. Afilias will continue these rigorous security measures, which include:

- Multiple layers of security and access controls throughout registry and support systems;
- 24x7 monitoring of all registry and DNS systems, support systems and facilities;
- Unique, proven registry design that ensures data integrity by granting only authorized access to the registry system, all while meeting performance requirements;
- Detailed incident and problem management processes for rapid review, communications, and problem resolution, and;
- Yearly external audits by independent, industry-leading firms, as well as twice-yearly internal audits.

Security policies and protocols

Afilias has included security in every element of its service, including facilities, hardware, equipment, connectivity/Internet services, systems, computer systems, organizational security, outage prevention, monitoring, disaster mitigation, and escrow/insurance, from the original design, through development, and finally as part of production deployment. Examples of threats and the confidential and proprietary mitigation procedures are detailed in our response to question #30(b).

There are several important aspects of the security policies and procedures to note:

- Afilias hosts domains in data centers around the world that meet or exceed global best practices.
- Afilias' DNS infrastructure is massively provisioned as part of its DDoS mitigation strategy, thus ensuring sufficient capacity and redundancy to support new gTLDs.
- Diversity is an integral part of all of our software and hardware stability and robustness plan, thus avoiding any single points of failure in our infrastructure.
- Access to any element of our service (applications, infrastructure and data) is only provided on an as-needed basis to employees and a limited set of others to fulfill their job functions. The principle of least privilege is applied.
- All registry components - critical and non-critical - are monitored 24x7 by staff at our NOCs, and the technical staff has detailed plans and procedures that have stood the test of time for addressing even the smallest anomaly. Well-documented incident management procedures are in place to quickly involve the on-call technical and management staff members to address any issues.

Afilias follows the guidelines from the ISO 27001 Information Security Standard (Reference: http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=42103) for the management and implementation of its Information Security Management System. Afilias also utilizes the COBIT IT governance framework to facilitate policy development and enable controls for appropriate management of risk (Reference: <http://www.isaca.org/cobit>). Best practices defined in ISO 27002 are followed for defining the security controls within the organization. Afilias continually looks to improve the efficiency and effectiveness of our processes, and follows industry best practices as defined by the IT Infrastructure Library, or ITIL (Reference: <http://www.itil-officialsite.com/>).

The Afilias registry system is located within secure data centers that implement a multitude of security measures both to minimize any potential points of vulnerability and to limit any damage should there be a breach. The characteristics of these data centers are described fully in our response to question #30(b).

The Afilias registry system employs a number of multi-layered measures to prevent unauthorized access to its network and internal systems. Before reaching the registry network, all traffic is required to pass through a firewall system. Packets passing to and from the Internet are inspected, and unauthorized or unexpected attempts to connect to the registry servers are both logged and denied. Management processes are in place to ensure each request is tracked and documented, and regular firewall audits are performed to ensure proper operation. 24x7 monitoring is in place and, if potential malicious activity is detected, appropriate personnel are notified immediately.

Afilias employs a set of security procedures to ensure maximum security on each of its servers, including disabling all unnecessary services and processes and regular application of security-related patches to the operating system and critical system applications. Regular external vulnerability scans are performed to verify that only services intended to be available are accessible.

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Regular detailed audits of the server configuration are performed to verify that the configurations comply with current best security practices. Passwords and other access means are changed on a regular schedule and are revoked whenever a staff member's employment is terminated.

Access to registry system

Access to all production systems and software is strictly limited to authorized operations staff members. Access to technical support and network operations teams where necessary are read only and limited only to components required to help troubleshoot customer issues and perform routine checks. Strict change control procedures are in place and are followed each time a change is required to the production hardware/application. User rights are kept to a minimum at all times. In the event of a staff member's employment termination, all access is removed immediately.

Afilias applications use encrypted network communications. Access to the registry server is controlled. Afilias allows access to an authorized registrar only if each of the authentication factors matches the specific requirements of the requested authorization. These mechanisms are also used to secure any web-based tools that allow authorized registrars to access the registry. Additionally, all write transactions in the registry (whether conducted by authorized registrars or the registry's own personnel) are logged.

EPP connections are encrypted using TLS/SSL, and mutually authenticated using both certificate checks and login/password combinations. Web connections are encrypted using TLS/SSL for an encrypted tunnel to the browser, and authenticated to the EPP server using login/password combinations.

All systems are monitored for security breaches from within the data center and without, using both system-based and network-based testing tools. Operations staff also monitor systems for security-related performance anomalies. Triple-redundant continual monitoring ensures multiple detection paths for any potential incident or problem. Details are provided in our response to questions #30(b) and #42. Network Operations and Security Operations teams perform regular audits in search of any potential vulnerability.

To ensure that registrar hosts configured erroneously or maliciously cannot deny service to other registrars, Afilias uses traffic shaping technologies to prevent attacks from any single registrar account, IP address, or subnet. This additional layer of security reduces the likelihood of performance degradation for all registrars, even in the case of a security compromise at a subset of registrars.

There is a clear accountability policy that defines what behaviors are acceptable and unacceptable on the part of non-staff users, staff users, and management. Periodic audits of policies and procedures are performed to ensure that any weaknesses are discovered and addressed. Aggressive escalation procedures and well-defined Incident Response management procedures ensure that decision makers are involved at early stages of any event.

In short, security is a consideration in every aspect of business at Afilias, and this is evidenced in a track record of a decade of secure, stable and reliable service.

Independent assessment

Supporting operational excellence as an example of security practices, Afilias performs a number of internal and external security audits each year of the existing policies, procedures and practices for:

- Access control;
- Security policies;
- Production change control;
- Backups and restores;
- Batch monitoring;
- Intrusion detection, and
- Physical security.

Afilias has an annual Type 2 SSAE 16 audit performed by PricewaterhouseCoopers (PwC). Further, PwC performs testing of the general information technology controls in support of the financial statement audit. A Type 2 report opinion under SSAE 16 covers whether the controls were properly designed, were in place, and operating effectively during the audit period (calendar year). This SSAE 16 audit includes testing of internal controls relevant to Afilias' domain registry system and processes. The report includes testing of key controls related to the following control objectives:

- Controls provide reasonable assurance that registrar account balances and changes to the registrar account balances are authorized, complete, accurate and timely.

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- Controls provide reasonable assurance that billable transactions are recorded in the Shared Registry System (SRS) in a complete, accurate and timely manner.
- Controls provide reasonable assurance that revenue is systemically calculated by the Deferred Revenue System (DRS) in a complete, accurate and timely manner.
- Controls provide reasonable assurance that the summary and detail reports, invoices, statements, registrar and registry billing data files, and ICANN transactional reports provided to the Registry Operator(s) are complete, accurate and timely.
- Controls provide reasonable assurance that new applications and changes to existing applications are authorized, tested, approved, properly implemented and documented.
- Controls provide reasonable assurance that changes to existing system software and implementation of new system software are authorized, tested, approved, properly implemented and documented.
- Controls provide reasonable assurance that physical access to data centers is restricted to properly authorized individuals.
- Controls provide reasonable assurance that logical access to system resources is restricted to properly authorized individuals.
- Controls provide reasonable assurance that processing and backups are appropriately authorized and scheduled and that deviations from scheduled processing and backups are identified and resolved.

The last Type 2 report issued was for the year 2010, and it was unqualified, i.e., all systems were evaluated with no material problems found.

During each year, Afiliias monitors the key controls related to the SSAE controls. Changes or additions to the control objectives or activities can result due to deployment of new services, software enhancements, infrastructure changes or process enhancements. These are noted and after internal review and approval, adjustments are made for the next review.

In addition to the PricewaterhouseCoopers engagement, Afiliias performs internal security audits twice a year. These assessments are constantly being expanded based on risk assessments and changes in business or technology.

Additionally, Afiliias engages an independent third-party security organization, PivotPoint Security, to perform external vulnerability assessments and penetration tests on the sites hosting and managing the Registry infrastructure. These assessments are performed with major infrastructure changes, release of new services or major software enhancements. These independent assessments are performed at least annually. A report from a recent assessment is attached with our response to question #30(b).

Afiliias has engaged with security companies specializing in application and web security testing to ensure the security of web-based applications offered by Afiliias, such as the Web Admin Tool (WAT) for registrars and registry operators.

Finally, Afiliias has engaged IBM's Security services division to perform ISO 27002 gap assessment studies so as to review alignment of Afiliias' procedures and policies with the ISO 27002 standard. Afiliias has since made adjustments to its security procedures and policies based on the recommendations by IBM.

Special TLD considerations

Afiliias' rigorous security practices are regularly reviewed; if there is a need to alter or augment procedures for this TLD, they will be done so in a planned and deliberate manner.

Commitments to registrant protection

With over a decade of experience protecting domain registration data, Afiliias understands registrant security concerns. Afiliias supports a "thick" registry system in which data for all objects are stored in the registry database that is the centralized authoritative source of information. As an active member of IETF (Internet Engineering Task Force), ICANN's SSAC (Security & Stability Advisory Committee), APWG (Anti-Phishing Working Group), MAAWG (Messaging Anti-Abuse Working Group), USENIX, and ISACA (Information Systems Audits and Controls Association), the Afiliias team is highly attuned to the potential threats and leading tools and procedures for mitigating threats. As such, registrants should be confident that:

- Any confidential information stored within the registry will remain confidential;
- The interaction between their registrar and Afiliias is secure;
- The Afiliias DNS system will be reliable and accessible from any location;
- The registry system will abide by all polices, including those that address registrant data;
- Afiliias will not introduce any features or implement technologies that compromise access to the registry system or that compromise registrant security.

Afilias has directly contributed to the development of the documents listed below and we have implemented them where appropriate. All of these have helped improve registrants' ability to protect their domains name(s) during the domain name lifecycle.

- [SAC049]: SSAC Report on DNS Zone Risk Assessment and Management (03 June 2011)
- [SAC044]: A Registrant's Guide to Protecting Domain Name Registration Accounts (05 November 2010)
- [SAC040]: Measures to Protect Domain Registration Services Against Exploitation or Misuse (19 August 2009)
- [SAC028]: SSAC Advisory on Registrar Impersonation Phishing Attacks (26 May 2008)
- [SAC024]: Report on Domain Name Front Running (February 2008)
- [SAC022]: Domain Name Front Running (SAC022, SAC024) (20 October 2007)
- [SAC011]: Problems caused by the non-renewal of a domain name associated with a DNS Name Server (7 July 2006)
- [SAC010]: Renewal Considerations for Domain Name Registrants (29 June 2006)
- [SAC007]: Domain Name Hijacking Report (SAC007) (12 July 2005)

To protect any unauthorized modification of registrant data, Afilias mandates TLS/SSL transport (per RFC 5246) and authentication methodologies for access to the registry applications. Authorized registrars are required to supply a list of specific individuals (five to ten people) who are authorized to contact the registry. Each such individual is assigned a pass phrase. Any support requests made by an authorized registrar to registry customer service are authenticated by registry customer service. All failed authentications are logged and reviewed regularly for potential malicious activity. This prevents unauthorized changes or access to registrant data by individuals posing to be registrars or their authorized contacts.

These items reflect an understanding of the importance of balancing data privacy and access for registrants, both individually and as a collective, worldwide user base.

The Afilias ²⁴/ Customer Service Center consists of highly trained staff who collectively are proficient in 15 languages, and who are capable of responding to queries from registrants whose domain name security has been compromised - for example, a victim of domain name hijacking. Afilias provides specialized registrant assistance guides, including specific hand-holding and follow-through in these kinds of commonly occurring circumstances, which can be highly distressing to registrants

Security resourcing plans

Please refer to our response to question #30b for security resourcing plans.

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Exhibit D

[Home](#)[Business SaaS](#)[Marketing Training](#)

Business & Marketing SaaS Reviews – GCCIX Media

Funnels To Grow Your BusinessWelcome to [GCCIX Media](#). The purpose of this site is to give you a single source of information on every aspect of the Clickfunnels software suite. Clickfunnels has become extremely popular recently. Here we share the pros and cons of using the software and how it compares to other sales funnels software products on the market.

There are so many online marketing tools and software solutions out there and it can certainly

become overwhelming when trying to decide upon which ones will be the best fit for your business. So we aim to present the best solutions for all types of businesses.

If you've already been researching the different sales funnel solutions then you may already be aware that there are actually a lot of very good products out there to choose from. However, just because it's a great product, doesn't mean that it's the right fit for your business. Here provide the details you need to know in order to find the best solution for you.

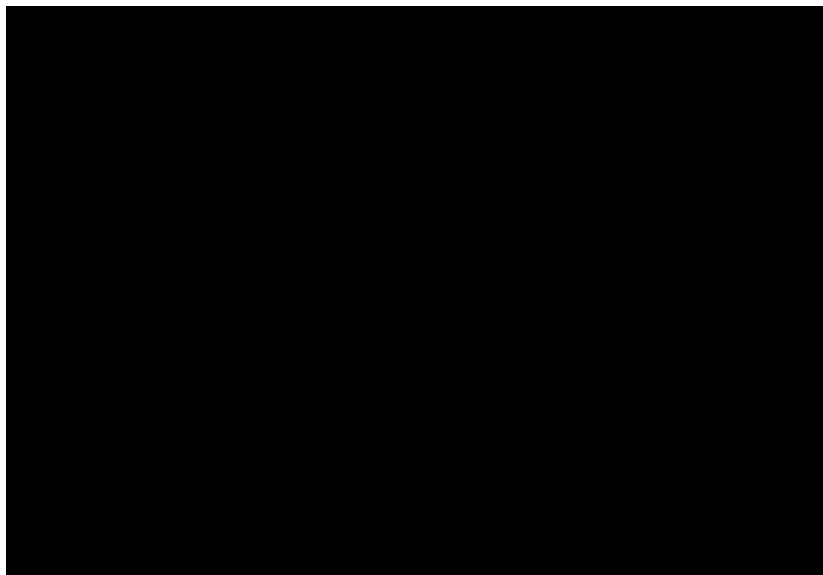
Currently our funnel builder of choice is Clickfunnels. Since they offer a free trial we recommend signing up for an account and take it for a test spin.

Fortunately, Clickfunnels is very easy and intuitive to use and there is a wealth of resources and training videos to show you exactly how to use it, step-by-step. It doesn't matter what your business model is or what you are selling, there are support videos to show you what you need to do to get your funnel set up quickly and easily.

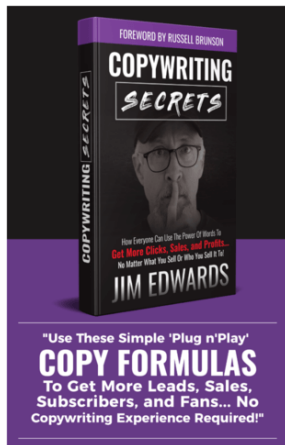


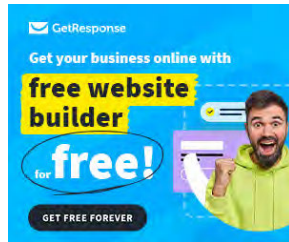
Being an internet marketer, I have tried and tested a vast range of software tools over the years, some better than others, and some have been just downright terrible. The good news is that due to the highly competitive nature of the industry, many of the software solutions out there today (at least the good ones) now offer some kind of free trial period, as I mentioned above.

This is a much more honest approach as it allows businesses to try software products before they commit to purchase to see if it is a good fit for your business. If not then you can cancel your subscription or membership at no cost to you.



Business today is very fast-paced, so it is important to be able to get the information you need quickly so you can make an informed decision that will serve your business well and keep your company growing and increasing its profitability.







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Disclosure: I am an independent ClickFunnels Affiliate, not an employee. I receive referral payments from ClickFunnels. The opinions expressed here are my own and are not official statements of ClickFunnels or its parent company, Etison LLC.

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