

**Registries Constituency
Generic Names Support Organization
Internet Corporation for Assigned Names and Numbers**

September 25, 2009

Hon. Janis Karklins
Chairman of the Governmental Advisory Committee
Ambassador of Latvia to France
via email: janis.karklins@icann.org

Dear Janis:

On September 22, 2009, Peter Dengate Thrush, Chairman of the Board of ICANN, wrote to you in response to the letter of the Governmental Advisory Committee of August 18, 2009 regarding version 2 of ICANN's Draft Applicant Guidebook. This letter is sent to correct a statement in the Chairman's letter regarding the position of ICANN'S Registries Constituency with regard to possible restrictions on cross-ownership of registries, registrars and back end service providers under ICANN's proposed guidelines for new gTLDs.

I write in my capacity as Chair of that Constituency. As you know, the Registries Constituency comprises all the parties under contract with ICANN to manage the registries of domain names in the generic top level domains (gTLDs).

On page 7 of the Chairman's letter, he states:

"The registry constituency issued a report that opposed integration and sought to prohibit registrars from competing for back-end services."

This is not correct. The registries support competition in the market for new gTLDs and firmly believe that all qualified back-end registry service providers – including providers affiliated with ICANN accredited registrars - should be permitted to compete to serve new and existing gTLDs.

The Registries Constituency, made a proposal, dated 13 April 2009, and posted on ICANN's web site at <http://forum.icann.org/lists/2gtld-guide/pdf87R06c18Sd.pdf>, that quite clearly would permit registry operators and registry service providers to own ICANN accredited registrars and vice versa. This proposal would simply limit the ability of a registry or registry service provider from acting as an authorized registrar, reseller or distributor of domain names within the TLD through the same entity that provides Registry Services for the TLD. The Constituency's proposal provides for certain exceptions for smaller registries, such as single registrant TLDs, and a 50,000 name carve out for community-based TLDs.

I trust that this will clarify the position of the Registries Constituency. Please do not hesitate to let me know if you would like further information from the Constituency on this issue.

Sincerely,

/s/ David

David W. Maher
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cc: Peter Dengate Thrush
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