KIRTON | McCONKIE

13 August 2013

Dear ICANN Staff,

IRI Domain Management LLC ("IRI"), applicant for the gTLD .MORMON (No. 1-1098-52000), hereby requests an exemption to the Registry Operator Code of Conduct.

Pursuant to Specification 9 of the New gTLD Registry Agreement, IRI attests that it meets the standard for an exemption:

(1) All domain name registrations in .MORMON will be registered to, and maintained by, IRI for its own exclusive use. Evidence of IRI's intent to maintain exclusive use of domain registrations in .MORMON is indicated by the registration policy submitted in response to question 18(b) of the application for .MORMON. A copy of that registration policy is attached.

(2) IRI will not sell, distribute, or transfer control or use of any registrations in .MORMON to any third party that is not an Affiliate of IRI. Evidence of IRI's intent not to permit third-party control of domain names in .MORMON is likewise indicated by the attached registration policy.

(3) Application of the Code of Conduct to .MORMON is not necessary to protect the public interest. Operation of .MORMON will have minimal effect on the marketplace, because IRI will not merchandise domain names in this gTLD to third parties. Measures intended to protect the public interest from anticompetitive abuse, including requiring new registry operators to provide open access to registrars, are unnecessary to protect the public when domain names in .MORMON will be exclusively registered and controlled by IRI and its affiliates.

Because IRI meets ICANN's established written standard, it respectfully requests an exemption from the Registry Operator Code of Conduct.

Please contact me with any questions or concerns.

Sincerely,

Attorney for IRI Domain Management LLC

RSG:bcw
Enclosure

Registration Policy for .MORMON

iv. Intended Registration Policies.

a. Eligibility

Eligibility to register domain names under the .MORMON gTLD will be highly restricted. Only the Applicant and its designated representative, Church officers and employees, and organizations affiliated with the Church will have authority to register names. Restricting eligibility in this manner is justified because the mission of the proposed gTLD is to serve the Community, not to recover revenues through the sale of domains, and because permitting third-party registrants could confuse Community members about the authenticity of content on the gTLD, contrary to that mission.

The Applicant has developed a list of acceptable domains. They include names that denote the Church's values such as service to others, lifelong learning, freedom to choose, and good citizenship; names describing the Church's beliefs such as faith in Jesus Christ, God's Plan of Happiness, God's Commandments, Joseph Smith, and the Book of Mormon; and domains directing the user to "Worship with Us" or "Meet Missionaries." Acceptable domain names also refer the reader to affiliated Church organizations such as "LDS Humanitarian Services."

A list of Reserved Names has also been developed, composed of domain names that the Applicant will not resolve under the .LDS TLD. Inappropriate terms such as "money" and "politics." Individual Church members will not be granted domain names, in order to preserve the use of the .MORMON gTLD for the needs of the Church and its members, generally.

New domain names will be added through an internal process that has been established. Domain names may be proposed by any party eligible to register names. The proposed name will be forwarded to the Applicant's manager and its outside counsel, Kirton McConkie. Registration requests will be decided by the manager in consultation with outside counsel. Disputes concerning eligibility will also be decided by the manager in consultation with outside counsel.

b. Name Selection

- Domain names under the .MORMON gTLD will be at least 3 characters and no more than 63 characters long.
- Domain names will consist only of letters, numbers, and hyphens and will start and end with an alphanumeric character but not a hyphen.

Applicant will reserve from registration all names contained in Specification 5 of the New gTLD Agreement, "Schedule of Reserved Names at the Second Level in gTLD Registries." This includes reservation of:

- The label "EXAMPLE";
- Two-character labels, unless released pursuant to an agreement with the relevant government and country-code manager;
- Tagged domain names, defined as domain names with hyphens in the third and fourth positions;

- Names for registry operations, including NIC, WWW, IRIS, and WHOIS;
- Country names and territory names, except pursuant to an agreement with the relevant government or subject to the review by ICANN's Governmental Advisory Committee ("GAC") and approval by the ICANN Board of Directors.

Any party eligible to register domains under the .MORMON gTLD will be allowed to register any second-level domain in the format of "anyname.lds," subject to the restrictions described above and the legal rights protections required by Specification 7 of the New gTLD Agreement.

c. Content/use

Domains registered under the .MORMON gTLD will be used in conformity with the stated mission of the proposed TLD. This means that domain names will be used to serve the needs and interests of the Church and its members, as determined by the Applicant's manager in consultation with outside counsel.

d. Enforcement

Internal policies and procedures prevent any domain name from being added to the .MORMON registry without the approval of the Applicant's manager. Every request for a domain name will be decided by him, in consultation with the Applicant's outside counsel, Kirton McConkie. Their review will be intended to maintain compliance with Registration Policies and to retain a close nexus between the actual operations of the registry and its mission. Outside counsel will maintain the list of Reserved Names. Any internal challenges to a proposed domain name registration will be decided by the Applicant's manager following a recommendation by outside counsel.

Because the .MORMON gTLD is restricted to the Applicant and related entities, no enforcement issues with respect to third parties will arise and appeal mechanisms applicable to such issues are unnecessary.