Exhibit 1

Code of Conduct Exemption Request Form

Internet Corporation for Assigned Names and Numbers ("ICANN")
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094
Attention: New gTLD Program Staff

RE: Request for Exemption from Registry Operator Code of Conduct

Neustar, Inc ("Registry Operator"), in connection with the execution of the Registry Agreement for the .Neustar TLD (the "Registry Agreement"), hereby requests an exemption from the obligations of the Registry Operator Code of Conduct set forth in Specification 9 to the Registry Agreement (the "Code of Conduct"). Pursuant to such request, Registry Operator confirms that each of the following statements is true and correct (collectively, referred to as the "Statements"):

1. All domain name registrations in the TLD are registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliate (as defined in the Registry Agreement);

2. Registry Operator does not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Registry Operator; and

3. Application of the Code of Conduct to the TLD is not necessary to protect the public interest for the following reasons:

As stated in Neustar's application in response to the Applicant Guidebook, The .neustar gTLD will create a trusted and secure location for Neustar brand constituents to log in to mission-critical Internet and telecommunications infrastructure services provided by Neustar, obtain customer service, and exchange critical information required by the communities that use Neustar's services. Neustar provides trusted and neutral real-time information and analytics to the Internet, telecommunications, entertainment, marketing and advertising industries, which use the services to find, connect and authenticate their end-users. More specifically, Neustar proposes that only Neustar, its qualified subsidiaries and affiliates will be allowed to request second level domain registrations. In addition, such names will not be sold, distributed or controlled by any third party that is not an Affiliate of Neustar (as defined in the new gTLD Registry Agreement).

The Code of Conduct was established by ICANN to address non-discriminatory access for all authorized ICANN-Accredited Registrars in line with ICANN's core values which include both (1) "where feasible and appropriate, depending on market mechanisms to promote and sustain a competitive environment" and (2) "Introducing and promoting competition in the registration of domain names where practicable and beneficial in the public interest." See http://www.icann.org/en/about/governance/bylaws#I.

That said, according to CRA International's study commissioned for ICANN in 2008, in a single-registrant TLD model, where the registry and registrants are one, "a requirement that registry and registrar functions be separated would be especially inefficient." See http://news.dot-nxt.com/sites/news.dot-nxt.com/files/revisiting-vertical-separation-farrell-hayes-mcdermott-grunditz.pdf?_sm_au_=iVVwqwQ3FLRJpJNj at pg. 28. The report goes on to say that in addition to the inefficiency of such a structure, there could also be security concerns, especially if equal access requirements were also in force. "What if a rival to the single owner obtained ICANN accreditation as a registrar?" The report goes on to conclude that "The existing vertical separation and equal access requirements are particularly inappropriate for this potential new business model. Without suspending those requirements, it seems unlikely there will be many if any candidates for such TLDs."

Given CRA's rationale, and the commitments made by Neustar with respect to its registration policies, we see no reason to compel Neustar to adhere to a Code of Conduct which would be inefficient, raise security concerns by opening itself up to third party registrars, and does not advance ICANN's core value of promoting and sustaining competition. Therefore, we do not believe that the application of the Code of Conduct would be necessary to

protect the public interest.

Registry Operator represents that the registration policies attached hereto as <u>Exhibit A</u> are a true and correct copy of the Registry Operator's registration policies for the TLD. Registry Operator agrees that if Registry Operator makes any changes to its registration policies (whether before or after an exemption has been granted), it will promptly provide ICANN with a revised set of registration policies.

Registry Operator acknowledges and agrees that in the event that any of the foregoing Statements becomes untrue (including after ICANN has granted an exemption pursuant to this exemption request), any Code of Conduct exemption granted by ICANN to Registry Operator for the TLD shall immediately expire, and Registry Operator shall (i) immediately notify ICANN specifying in reasonable detail the circumstances causing any of the Statements to be untrue and (ii) immediately comply with the Code of Conduct.

Registry Operator further acknowledges and agrees that ICANN may revoke this exemption at any time based upon evidence reasonably satisfactory to ICANN that the Statements have become untrue. In the event that ICANN provides notice that it has revoked this exemption, Registry Operator shall immediately comply with the Code of Conduct.

Questions about this request should be directed to [Redacted] at [Redacted].

Submitted by:[Redacted]

Position: VP Business Affairs

Date Noted: Sept 30, 2013

Email: [Redacted]

Exhibit A

Registry Operator hereby acknowledges that the following are the true and correct registration policies for the TLD:

.neustar

Mission: The .neustar gTLD will create a trusted and secure location for Neustar brand constituents to log in to mission-critical Internet and telecommunications infrastructure services provided by Neustar, obtain customer service, and exchange critical information required by the communities that use Neustar's services. Neustar provides trusted and neutral real-time information and analytics to the Internet, telecommunications, entertainment, marketing and advertising industries, which use the services to find, connect and authenticate their end-users.

More specifically, Neustar's goals for the .neustar gTLD are to:

1. Provide a single, secure location for all Neustar-branded services;

2. Ensure no customer confusion regarding location of Neustar-branded services; and

3. Provide the Internet community a single location for interacting with Neustar.

.Neustar Registration Policies

Neustar currently intends for the .neustar gTLD to be used exclusively by Neustar and its qualified subsidiaries and affiliates. As Neustar intends to use the gTLD for its own branding purposes, most of the registration policies will be written into existing corporate policies. Neustar will implement the following registration policies:

- *.neustar Domain Name Eligibility Requirements*
- *Acceptable Use Policy*
- *Rights Protection Mechanisms*
- *ICANN Consensus Policies*

1. Neustar Domain Name Eligibility Requirements

The .neustar Domain Registration Eligibility policy sets forth the guidelines that dictate the allowable labels for domain name registrations, who or what entities may register the names, how the names may be used as well as the technical criteria each name must meet.

Neustar proposes that only Neustar, its qualified subsidiaries and affiliates will be allowed to request second level domain registrations. Neustar will implement an internal process that will define how they can submit second-level registration requests and the process which will be used to approve such registrations. Neustar envisions having a domain management department that will be responsible for the receipt of domain name registration requests from specially designated and approved managers (Domain Manager) though a documented internal request form. Once the Domain Manager receives a registration request, an internal review will be completed to ensure the name complies with internal policies and procedures

governing the registration of .neustar domain name as well as complies with the technical specifications in the ICANN Agreement. Once the name has undergone the standard review, and is deemed in compliance with internal rules and procedures, the name will be approved and submitted through an ICANN-Accredited Registrar for registration.

2. Acceptable Use Policy
This Acceptable Use Policy gives Neustar (the "Registry") the ability to quickly lock, cancel, transfer or take ownership of any .neustar domain name, either temporarily or permanently, if the domain name is being used in a manner that appears to threaten the stability, integrity or security of the Registry, or any of its registrar partners – and/or that may put the safety and security of any registrant or user at risk. The process also allows the Registry to take preventive measures to avoid any such criminal or security threats.

The Acceptable Use Policy may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the on-going monitoring by the Registry or its partners. In all cases, the Registry or its designees will alert Registry's registrar partners about any identified threats, and will work closely with them to bring offending sites into compliance.

The following are some (but not all) activities that may be subject to rapid domain compliance:

- *Phishing: the attempt to acquire personally identifiable information by masquerading as a website other than .neustar's own.*
- *Pharming: the redirection of Internet users to websites other than those the user intends to visit, usually through unauthorized changes to the Hosts file on a victim's computer or DNS records in DNS servers.*
- *Dissemination of Malware: the intentional creation and distribution of "malicious" software designed to infiltrate a computer system without the owner's consent, including, without limitation, computer viruses, worms, key loggers, and Trojans.*
- *Fast Flux Hosting: a technique used to shelter Phishing, Pharming and Malware sites and networks from detection and to frustrate methods employed to defend against such practices, whereby the IP address associated with fraudulent websites are changed rapidly so as to make the true location of the sites difficult to find.*
- *Botnetting: the development and use of a command, agent, motor, service, or software which is implemented: (1) to remotely control the computer or computer system of an Internet user without their knowledge or consent, (2) to generate direct denial of service (DDOS) attacks.*
- *Malicious Hacking: the attempt to gain unauthorized access (or exceed the level of authorized access) to a computer, information system, user account or profile, database, or security system.*
- *Child Pornography: the storage, publication, display and/or dissemination of pornographic materials depicting individuals under the age of majority in the relevant jurisdiction.*

Neustar reserves the right, in its sole discretion, to take any administrative and operational actions necessary, including the use of computer forensics and information security technological services, among other things, in order to implement the Acceptable Use Policy. In addition, Neustar reserves the right 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, in its discretion; (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 as well as its affiliates, subsidiaries, officers, directors, and employees; (4) per the terms of the registration agreement or (5) to correct mistakes made by the Registry or any Registrar in connection with a domain name registration. Neustar also reserves the right to place upon registry lock, hold or similar status a domain name during resolution of a dispute.

3. Rights Protection Mechanisms

Neustar is committed to following all mandatory ICANN rights protection mechanisms aimed at protecting third party intellectual property rights within .neustar. Neustar plans to operate and maintain the .neustar space as an extension of its current branding activities, therefore, it is highly unlikely that names in the zone will interfere with the rights of other third parties.

Nevertheless, Neustar plans to implement all Rights Protection Mechanisms (RPMs) as required by ICANN. These RPMs include, but are not limited to the following:

* Sunrise and Trademark Claims Process
* Implementation of the Uniform Dispute Resolution Policy (UDRP)
* Implementation of the Uniform Rapid Suspension (URS) mechanism

4. Privacy.

Neustar will ensure that the operation of the .neustar TLD will be consistent with Neustar's Privacy Policy, available on its website at http://www.neustar.biz/privacy.