



Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536
USA

September 27, 2013

**Application no. 1-906-65402: Request for Exemption from Registry Agreement Specification 9,
Code of Conduct**

Dear ICANN,

We refer to the Registry Agreement currently being prepared for new gTLD, .OTSUKA

The registry, Otsuka Holdings, Co. Ltd. respectfully requests to be exempted from the Code of Conduct in Specification 9 of the Registry Agreement.

The registry is confident that it has clearly demonstrated the following three conditions required to receive an exemption.

- (i) All domain name registrations in the TLD will be registered to, and maintained by, Otsuka Holdings for its own exclusive use.
- (ii) Otsuka Holdings will not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Otsuka Holdings, and
- (iii) Application of the Code of Conduct to the TLD is not necessary to protect the public interest.

The registration policies to be implemented for .OTSUKA were described in detail in our new gTLD application. Registration eligibility will be restricted to:

1. Otsuka Holdings Co., Ltd.
2. Companies listed on the asset securities reports of Otsuka Holdings Co., Ltd. and other consolidated subsidiaries
3. Unconsolidated subsidiaries of Otsuka Holdings Co., Ltd.

Otsuka Holdings Co., Ltd.

Shinagawa Grand Central Tower 2-16-4 Konan, Minato-ku, Tokyo, 108-8241, Japan Phone: +81-3-6717-1410 Fax: +81-3-6717-1409

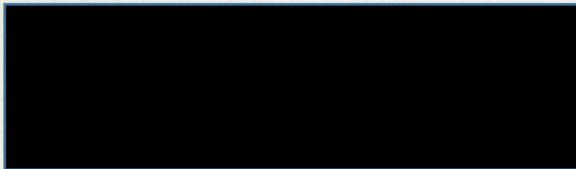


4. Affiliate companies of Otsuka Holdings Co., Ltd. ("Affiliate" as defined by the Registry Agreement)

Each registrant will be vetted directly by the registry and proof of registration eligibility will be required.

The TLD, .OTSUKA will be for the exclusive use of Otsuka Holdings, and therefore the Code of Conduct is not required to protect the public interest.

Yours sincerely,



Operating Officer,

Internal Control Department

Otsuka Holdings Co. Ltd.