

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

World Trade Centers Association, Inc. (“Registry Operator”), in connection with the execution of the Registry Agreement for the .WTC 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 shall be registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliates (as defined in the Registry Agreement);
2. Registry Operator shall 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:

The .WTC TLD is intended to benefit Internet users by enabling Registry Operator to communicate more easily and effectively with all Internet users, and particularly with Registry Operator’s many Affiliates, employees and the Affiliates’ businesses. Internet users will benefit from a more distinctive and trustworthy Internet experience in dealing with Registry Operator and its Affiliates. Registry Operator expects Internet users to benefit from the TLD by increased and more effective brand recognition in Registry Operator’s marketing and communications, and by having an ample supply of relevant and available domain names to use in its business. It is anticipated that these available domains will replace the various TLD and sub-domain names currently employed by many of Registry Operator’s Affiliates or held by unlicensed third parties, which has resulted in a multiplicity of inconsistent domains that confuse Internet users who wish to communicate and do business with authorized licensed World Trade Centers around the world. In addition, by allowing Registry Operator to establish the naming- and use-protocols for the .WTC TLD’s domains licensed to Registry Operator’s Affiliates, the TLD will permit Registry Operator to have greater control over its online brand and services, including but not limited to robust trust and security features. In turn, those benefits are certain to result in a better Internet user experience, particularly for those Internet users interested in Registry Operator and its Affiliates’ products and services.

Registry Operator represents that the registration policies attached hereto as Exhibit A 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], the Contracting Point of Contact.

Submitted by:	[Redacted]
Position:	Contracting Point of Contact
Date Noted:	August 22, 2013
Email:	[Redacted]

EXHIBIT A

.WTC REGISTRATION POLICY

The Registry Operator intends for it and its Affiliates to be the only registrants of domain names within the TLD. This will ensure that such domain names only are used for purposes authorized by Registry Operator. Only relatively few, specifically designated employees of Registry Operator will have authority to authorize the registration and/or use of any such domain names by our Affiliates and their business customers, whose access and use will be subject to protocols set by Registry Operator.

To the extent that The Company authorizes Affiliates to register and/or use any such domain names, a written license will ensure that Registry Operator maintains control over all use of the domain name(s). That license will include specific guidelines and restrictions relating to use of the domain name(s), including but not limited to specific prohibitions against:

- Illegal or fraudulent actions;
- Spam
- Phishing
- Pharming
- Willful distribution of malware
- Botnet command and control
- Distribution of child pornography
- Illegal Access to Other Computers or Networks

Use of any and all licensed TLD domains will be monitored, and compliance with the contractual restrictions and guidelines will be enforced. Violations of any restrictions, guidelines or other contractual conditions may result in termination of the registration and/or accompanying license.