

## **Un-sponsored TLD Agreement (.Pro) Proposal for Changes 12 March 2008**

I am writing on behalf of RegistryPro which operates the .pro top-level domain (TLD) under an agreement with ICANN 3 May 2002 and amended 30 September 2004 (the Registry Agreement). The Registry Agreement, and Appendix L thereto, restrict RegistryPro to offering registrations only to persons and entities that are credentialed by entities (such as through governmental bodies and professional organizations) to provide professional services in the legal, medical, accountancy and engineering professions within a stated geographic region. The .pro names can only be registered (i) at the third level with designated profession-specific second level domains (PS-SLD), or (ii) at the second level with a redirect to the third level professional designator, or (iii) at the second level where the registrant has multiple profession specific third level registrations. These current restrictions have had a number of unanticipated results: registrants and prospective registrants are frustrated by the restrictive nature of the TLD; registrars find the requirements so cumbersome and burdensome that they are reluctant to offer the TLD; methods that have been alleged to compromise the spirit and intent of ICANN in establishing the .pro TLD have emerged as alternatives to the intended mechanisms/mechanics/methods of registration. In short, the registry has struggled to establish the TLD as an attractive choice for registrars and consumers, and to grow the registry in the manner anticipated by ICANN and the community in establishing the TLD. This letter constitutes RegistryPro's formal request to amend Appendices F and L to the Registry Agreement to broaden these restrictions so that the Registry can answer the demands of the community of potential registrants, the concerns of the authorized registrars and ICANN.

RegistryPro proposes to expand the number of professions that are eligible for profession specific third level registrations to include architecture, business, chiropractic, dentistry, education, nursing, pharmacy, religious ministry, and veterinary. In addition RegistryPro's proposal includes offering resolving names at the second level to all professionals worldwide. RegistryPro proposes the introduction of a Terms of Use Agreement (TOU) that intends regulation and limitation of the use of the .pro TLD to persons and entities that are credentialed by government recognized entities to provide professional services. RegistryPro also proposes changes to the Registry Agreement that will enable more effective and efficient functioning of the Advisory Board.

The changes sought by RegistryPro are modifications designed to further develop and refine the registry in a manner that is consistent with the intentions of the originators of the registry, and are intended to respond to increasing worldwide consumer concerns regarding access to the TLD for professionals. These innovations answer the community of prospective registrants by adopting a broader definition of professional that will make the .pro designation available in more jurisdictions and to more professionals. They also answer the registrar community who has communicated its frustration with the cumbersome nature of the registration process by offering second level resolving names. Finally, these modifications seek to preserve the spirit of the registry as it was intended in 2002 as a TLD to be used exclusively by professionals. RegistryPro believes that heeding the concerns of the community will result in a viable business for the Registry.

Support and considerable guidance in the formulation of RegistryPro's current proposal has been provided by the RegistryPro Advisory Board. RegistryPro has made various revisions and included specific text on the basis of suggestions from the Advisory Board. Included in this proposal is an alteration to the size of the Advisory Board to ensure that it will continue to function in its intended capacity.

The proposed changes do not have any impact on the security or stability of the registry or the DNS, and the proposed changes do not impact the registry-registrar provisioning system or Whois.

### Proposed Contract Amendments

RegistryPro proposes to replace the existing text of Appendix L to the Registry Agreement with the text set forth in Attachment 1 to this letter. The revised text reflects the following innovations:

1. RegistryPro proposes to grant third level PS-SLD domain names to an expanded list of professions. The expanded list appears at Section 3.2 in Appendix L to the Registry Agreement. The current practice of routine authentication and verification will be maintained for these third level PS-SLD domains.
2. Second level resolving names will be available to professionals in any jurisdiction. Although second level resolving names will still require collection of all information necessary to perform authentication and verification in the same way as is currently required for a PS-SLD, the provision of second level resolving names will not be contingent on the process of authentication and verification. Rather, these second level domains will be provisioned based on the professional registrant entering into the TOU agreement. RegistryPro proposes the TOU set forth at Exhibit H of the RRA. Just as authentication and verification will be re-verified at registration and annually thereafter for third level registrations, so will the TOU for second level resolving registrations. The registry will work directly with our partners to ensure that current registrants in the .Pro TLD are not discriminated against or disadvantaged by the implementation of these changes.
3. Modifications to the composition of the Advisory Board have been made to reflect the experience of the Board in carrying out its mandate. These changes will limit the size but not the scope of the Advisory Board.

In addition, RegistryPro proposes to replace the existing text of Appendix F to the Registry Agreement (the Registry-Registrar Agreement) to accommodate the TOU.

Sincerely,

Catherine Sigmar  
Registry.Pro