GAC Advice Response Form for Applicants

The Governmental Advisory Committee (GAC) has issued further advice to the ICANN Board of Directors regarding New gTLD applications. Please see Section IV of the GAC Los Angeles Communiqué for the full list of advice.

Respondents should use this form to ensure their responses are appropriately tracked and routed to the ICANN Board for its consideration. Please complete this form and submit it as an attachment to the ICANN Customer Service Center via your CSC Portal with the Subject, "[Application ID] Response to Los Angeles GAC Advice" (for example "1-111-11111 Response to Los Angeles GAC Advice"). All GAC Advice Responses to the GAC Los Angeles Communiqué must be received no later than 23:59:59 UTC on 17 November 2014.

Please note: This form will be publicly posted. Please do not include in this form any information that you do not want posted.

Respondent:

Applicant Name	Dot Registry, LLC
Application ID	1-880-35508
Applied for TLD (string)	LLP

Response:

Dot Registry, LLC commends the Government Advisory Committee's (GAC) continued effort to make the New gTLD Program Committee (NGPC) accountable for creating and implementing sustainable protection mechanisms for Category 1 and Category 2 strings. As the GAC notes in its Los Angeles Communiqué, it is not acceptable for the NGPC to continue to defer making "concrete responses" in regards to the implementation of the GAC's proposed accountability mechanisms. In choosing to not act on the items that the NGPC deems "challenging to implement," the NGPC is failing to protect registrants, end users, and the community at large. As the GAC notes in its Los Angeles Communiqué, the long-term risks associated with the irresponsible issuance of these Category 1 and Category 2 extensions far outweighs the temporary burden of implementing the advice.

It has been over three years since the GAC first announced the need for increased protections for Category 1 and Category 2 strings and still the NGPC has failed to create policies to uphold the GAC standards for verification of these extensions. This is not acceptable. The GAC has been repetitively clear and it is no longer a time to be patient and delay implementing the GAC advice any further. With countless new gTLDs going live every month, the sense of urgency for these protections has reached an all-time high and it is time for the NGPC to heed the GAC's warnings and build a solid "environment of trust" in order to achieve a long-term sustainable system of operations for registries of Category 1 and Category 2 Strings.

With the IANA transfer rapidly proceeding, it would be impossible for ICANN to put its best foot forward in all areas, showing the world that the ICANN Bylaws, which call for transparency, accountability, and operational governance, support Internet accountability, transparency and

stability. ICANN's Bylaws are a working document that is supported across the entire ICANN platform, which includes all stakeholder groups. It is our hope that NGPC's consistent inability to create concrete enforcement mechanisms and the continued attempt to pacify the GAC with non-committal, vague responses is not a reflection of ICANN's governance documents nor its overall core mission and values to support and promote the security and stability of the DNS. With this newest call to action by the GAC, the NGPC will reflect on its duties as a public steward of this program and come to the table with acceptable enforcement mechanisms that will be universally applied to all registries. ICANN serves the public in operating the DNS and cannot afford to take a reactive versus a proactive approach to securing Category 1 and Category 2 new gTLD strings. The NGPC cannot afford look the other way in regards to implementing GAC safeguards just because Category 1 and Category 2 applicants are in a hurry to launch their strings. To do so, ICANN would jeopardize the security and stability of the DNS, violate its own Bylaws, cause harm to the general public, and jeopardize the integrity of this and future new gTLD programs.

As the only community applicant for the Category 1 strings .INC, .LLC, .LLP, and .CORP, Dot Registry is acutely aware of the potential risks associated with the implementation of these extensions. Prior to Dot Registry submitting its applications for these strings, Dot Registry worked diligently to create pre-verification mechanisms and registration policies that not only protect the communities Dot Registry represents and the general public, but also look ahead to combat business identity theft, build confidence amongst consumers, and create long-term accountability procedures which build Internet security, stability and integrity, in alignment with ICANN's core mission and values.

In the United States, the designations of INC, LLC, LLP, and CORP are regulated by the incorporating State and imply a level of trust amongst consumers. These abbreviations indicate a business' right to conduct commerce transactions within the United States and provide consumers with a level of comfort in choosing whom to patronize. As brick and mortar businesses fade into the past, and consumers turn their focus to finding goods and services online, it becomes increasingly important to verify that businesses are representing themselves accurately online, especially those involving ecommerce and financial transactions.

Dot Registry has worked very closely with the Secretaries of State across the United States to create registration guidelines, enforcement mechanisms, and protection protocols that protect its community and Internet end users. Dot Registry's applications not only align with the GAC's advice, they enforce the state policies associated with business formation and entity reporting requirements within the United States. Through Dot Registry's ongoing relationship with the Secretaries of State and the National Association of Secretaries of State (NASS), Dot Registry has fine-tuned the pre-verification process, as described in its ICANN applications, and is proud of the integrity that these extensions would represent if operated through its Registry.

Should Dot Registry be awarded these corporate identifier strings, registrations would be restricted to members of the registered United States Business Community, as pre-verified through Dot Registry's registration process and continuously monitored. Dot Registry believes

in transparency and accountability in reporting and is the only viable applicant to operate these extensions who provides clear processes for verification, proactive abuse mitigation and has established a firm bond with the regulatory bodies who oversee these entity designations. The issuance of these strings without security mechanisms and cooperation of all state regulators would not only be confusing and damaging to the public, it could serve to create long term disguises for fraudulent business activity and shell corporations.

Over the years, NASS has issued several letters to ICANN calling for the necessity of supporting GAC advice in regards to Category 1 safeguards and additionally its belief in the Community Application Process. In June 2014, NASS joined Dot Registry in filing a Reconsideration Request with the ICANN's Board Governance Committee (BGC), which called into question the scoring of Dot Registry's applications during the Community Priority Evaluations (CPEs) in which it participated, the impartiality of the CPE evaluators and the inconsistencies between the CPE results and the CPE scoring criteria set forth in ICANN's gTLD Applicant Guidebook. Although the BGC denied NASS and Dot Registry's Reconsideration Request, it is apparent in the Los Angeles Communiqué that the GAC shares similar concerns about the CPE process. The rejection and misapplication of CPE guidelines is not a trivial problem called into question by disappointed applicants wishing for improved scoring. Dot Registry would encourage the NGPC to heed the GAC's request to review the CPE program and to take responsibility for CPE evaluators' interpretation and application of the CPE scoring criteria in order to ensure that the criteria are applied consistently.

Dot Registry is sympathetic to the growing pains of such a new and robust gTLD expansion program, but it has lost patience with the NGPC's inability to rise to the occasion and heed the GAC's advice. The GAC advice represents well-founded concerns that deserve not only consideration but implementation. Without the application of sustainable accountability mechanisms, the new gTLD program will fail to protect consumers, registrants and registries appropriately. The NGPC no longer has the luxury of delaying the development of these procedures and it is Dot Registry's hope that the Los Angeles Communiqué will act as a catalyst for Applicants, Stakeholders, and End Users to hold the NGPC accountable to the GAC.

This week several strings identified as Category 1 and Category 2 strings have become available for public sale. Below please find our recent letter to the Missouri Secretary of State in regards to the lack of verification and accounatability assigned to those extensions. The below examples represent the tangible proof that the GAC advice has not been heeded or applied. The delegation of these extensions combined with the NGPC's failure to implement the appropriate safeguards and enforcement mechanisms will result in paramount consumer harm. Actions must be taken immediately to curb any additional risk.

Dot Registry Letter to Jason Kander, Missouri Secretary of State

November 14, 2014

Missouri Secretary of State

GAC Advice Response Form for Applicants

Attn: Jason Kander
600 West Main Street
Jefferson City, MO 65191
+1.573.751.4936
Email: info@sos.mo.gov

Re: Implementation issues with corporate and financial category 1 Highly-regulated Sectors/Closed Entry strings

Today, we bring forth grave concerns in relation to the Internet Corporation for Assigned Names and Numbers (ICANN) new gTLD Category 1 sting safeguards and the delegation of those corporate and financial strings without adequate consumer, business, financial and government regulator protections, as required by ICANN in Section 11, Public Interest Commitments (PICs), in the Registry Agreement. This matter shakes the foundation on which ICANN has built the Internet upon. The facts support our concerns and those that should concern you, as well.

On April 11, 2013, the Government Advisory Committee (GAC) issued the Beijing Communiqué (see http://newgtlds.icann.org/en/applicants/advisories/gac-cat1-advice-19mar14-en) expressing clear opinions in regards to strings that are linked to "regulated or professional sectors." The GAC believes that these extensions, which are classified as Category 1 Strings, are "likely to invoke a level of implied trust from consumers, and carry higher levels of risk associated with consumer harm." The GAC further advised the ICANN Board to ensure the following safeguards to apply to strings that related to these sectors:

1. Registry operators will include in its acceptable use policy that registrants comply with all applicable laws, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures.
2. Registry operators will require registrars at the time of registration to notify registrants of this requirement.
3. Registry operators will require that registrants who collect and maintain sensitive health and financial data implement reasonable and appropriate security measures commensurate with the offering of those services, as defined by applicable law and recognized industry standards.
4. Establish a working relationship with the relevant regulatory, or industry self-regulatory, bodies, including developing a strategy to mitigate as much as possible the risks of fraudulent, and other illegal, activities.
5. Registrants must be required by the registry operators to notify to them a single point of contact which must be kept up-to-date, for the notification of complaints or reports of registration abuse, as well as the contact details of the relevant regulatory, or industry self-regulatory, bodies in their main place of business.

Further the NGPC, via Resolution No. 2014.02.05.ng01 (found at: https://www.icann.org/en/system/files/files/resolutions-new-gtld-annex-2-05feb14-en.pdf), has identified the following non-exhaustive list of strings that the above safeguards should apply to:

Regulated Sectors/Open Entry	Highly-regulated Sectors/Closed Entry

Requirements in Multiple Jurisdictions (Category 1 Safeguards 1-3 applicable)	Requirements in Multiple Jurisdictions (Category 1 Safeguards 1-8 applicable)
Children: .kid, .kids, .kinder, .game, .games, .juegos, .play, .school, .schule, .toys	
Environmental: .earth, .eco, .green, .bio, .organic	
Health and Fitness: .care, .diet, .fit, .fitness, .health, .healthcare,.heart, .hiv, .med, .organic, .rehab, .clinic, .healthy (IDN Chinese equivalent), .dental, .physio	**Health and Fitness:** .pharmacy, .surgery, .dentist, .dds, .hospital, .medical, .doctor
Financial: .capital, . cash, .cashbackbonus, .broker, .brokers, .claims, .exchange, .finance, .financial, .fianancialaid, .forex, .fund, .investments, .lease, .loan, .loans, .market,. markets, .money, .pay, .payu, .retirement, .save, .trading, .credit, .insure, .netbank,.tax, .travelersinsurance, .vermogensberatung, .mortgage, .reit	**Financial:** .bank, .banque, .creditunion, .creditcard, .insurance, .ira, . lifeinsurance, .mutualfunds, .mutuelle, vermogensberater, and .vesicherung .autoinsurance, .carinsurance
	Gambling: .bet, .bingo, .lotto, .poker, .spreadbetting, .casino
Charity: .care, .gives, .giving	**Charity:** .charity (and IDN Chinese equivalent)
Education: .degree, .mba	**Education:** .university
Intellectual Property: .audio, .book (and IDN equivalent), .broadway, .film, .game, .games, .juegos, .movie, .music, .software, .song, .tunes, .fashion (and IDN equivalent), .video, .app, .art, .author, .band, .beats, .cloud (and IDN equivalent), .data, .design, .digital, .download, .entertainment, .fan, .fans, .free, .gratis, .discount, .sale, .hiphop, .media, .news, .online, .pictures, .radio, .rip, .show, .theater, .theatre, .tour, .tours, .tvs, .video, .zip	
Professional Services: .accountant, .accountants, .architect,	**Professional Services:** .abogado, .attorney, .cpa, .dentist, .dds,

.associates, .broker, .brokers, .engineer, .legal, .realtor, .realty, .vet, .engineering, .law

.lawyer, .doctor

Corporate Identifiers:
.limited .

Corporate Identifiers:
.corp, .gmbh, .inc, .lie, .lip, .ltda, .ltd, .sarl, .srl, .sal

Generic Geographic Terms:
.town, .city, .capital
.reise, .reisen
.weather

Special Safeguards Required

Potential for Cyber Bullying/Harassment (Category 1 Safeguards 1-9 applicable):
.fail, .gripe, .sucks, .wtf

Inherently Governmental Functions (Category 1 Safeguards 1-8 and 10 applicable)
.army, .navy, .airforce

Category 1 Safeguards as Public Interest Commitments in Specification 11 of the New gTLD Registry Agreement

1. Registry operators will include a provision in their Registry-Registrar Agreements that ***requires Registrars to include in their Registration Agreements a provision requiring registrants to comply with all applicable laws, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures.***

2. Registry operators will include a provision in their Registry-Registrar Agreements that ***requires registrars at the time of registration to notify registrants of the requirement to comply with all applicable laws.***

3. Registry operators will include a provision in their Registry-Registrar Agreements that requires Registrars to include in their Registration Agreements ***a provision requiring that registrants who collect and maintain sensitive health and financial data implement reasonable and appropriate security measures commensurate with the offering of those services, as defined by applicable law.***

4. Registry operators will proactively create a clear pathway for the creation of a working relationship with the relevant regulatory or industry self-regulatory bodies by publicizing a point of contact and inviting such bodies to establish a channel of communication, including for the purpose of facilitating the development of a strategy to mitigate the risks of fraudulent and other illegal activities.

5. Registry operators will include a provision in their Registry-Registrar Agreements that requires Registrars to include in their Registration Agreements a provision requiring Registrants to provide administrative contact information, which must be kept up-to-date, for the notification of complaints or reports of registration abuse, as well as the contact details of the relevant regulatory, or industry self-regulatory, bodies in their main place of business.

6. Registry operators will include a provision in their Registry-Registrar Agreements that ***requires Registrars to include in their Registration Agreements a provision requiring a representation that the Registrant possesses any necessary authorisations, charters, licenses and/or other related credentials for participation in the sector associated with the Registry TLD string.***

7. If a Registry Operator receives a complaint expressing doubt with regard to the authenticity of licenses or credentials, Registry Operators should consult with relevant national supervisory authorities, or their equivalents regarding the authenticity.

8. Registry operators will include a provision in their Registry-Registrar Agreements that ***requires Registrars to include in their Registration Agreements a provision requiring Registrants to report any material changes to the validity of the Registrants' authorisations, charters, licenses and/or other related credentials for participation in the sector associated with the Registry TLD string in order to ensure they continue to conform to appropriate regulations and licensing requirements and generally conduct their activities in the interests of the consumers they serve.***

[APPLICABLE WHERE "SPECIAL SAFEGUARDS REQURIED" NOTED ABOVE.]

9. Registry Operator will develop and publish registration policies to minimize the risk of cyber bullying and/or harassment.

10. Registry operator will include a provision in its Registry-Registrar Agreements that ***requires Registrars to include in their Registration Agreements a provision requiring a representation that the Registrant will take reasonable steps to avoid misrepresenting or falsely implying that the Registrant or its business is affiliated with, sponsored or endorsed by one or more country's or government's military forces if such affiliation, sponsorship or endorsement does not exist.***

.SARL is a Category 1 **Highly-regulated Sectors/Closed Entry Requirements in Multiple Jurisdictions** corporate identifier extension and .CREDITCARD is a Category 1 **Highly-regulated Sectors/Closed Entry Requirements in Multiple Jurisdictions** financial extension, which would require the implementation of "further targeted safeguards," which the GAC advised the Board in the Beijing Communiqué, as follows:

1. In addition, some of the above strings may require further targeted safeguards, to address specific risks, and to bring registry policies in line with arrangements in place offline. In particular, a limited subset of the above strings are associated with market sectors which have clear and/or regulated entry requirements (such as: financial, gambling, professional services,

environmental, health and fitness, corporate identifiers, and charity) in multiple jurisdictions, and the additional safeguards below should apply to some of the strings in those sectors:

6. At the time of registration, the registry operator must verify and validate the registrants' authorisations, charters, licenses and/or other related credentials for participation in that sector.

7. In case of doubt with regard to the authenticity of licenses or credentials, Registry Operators should consult with relevant national supervisory authorities, or their equivalents.

8. The registry operator must conduct periodic post-registration checks to ensure registrants' validity and compliance with the above requirements in order to ensure they continue to conform to appropriate regulations and licensing requirements and generally conduct their activities in the interests of the consumers they serve.

.SARL is a commonly used acronym that represents limited liability companies located in various jurisdictions around the globe, primarily Europe and Latin America. This acronym is not a generic word, nor is it used in context other than signifying a business entity designation. For this reason, consumers believe that entities baring the extension of .SARL is a registered business entities which has the authority to conduct commerce transactions within their applicable jurisdiction. Business fraud is of top concern by allowing criminals to register .SARL domains unchecked and unverified with the regulating entity and in no way promotes a secure and stable Internet nor promotes consumer protections, consistent with GAC advice and the NGPC's adoption of the Category 1 Safeguards and those contained in Specification 11 of the registry's agreement with ICANN (found at: https://www.icann.org/resources/agreement/sarl-2014-07-03-en).

.CREDITCARD is a financial identifier string included in the Category 1 GAC safeguards. This acronym is not a generic word, nor is it used in contest other than for conveying financial credit by an approved lending institution. Online credit card and identity theft is one of the top Internet crimes in history and allowing criminals to register .CREDITCARD domains unchecked and unverified is in no way promotes a secure Internet nor promotes consumer protections, consistent with GAC advice and the NGPC's adoption of the Category 1 Safeguards and those contained in Specification 11 of the registry's agreement with ICANN (found at: https://www.icann.org/resources/agreement/creditcard-2014-03-20-en).

The public's perceptions and beliefs evolving around use of the Category 1 strings, especially corporate identifier and financial strings, drive the immediate need for sufficient enforceable safeguards, at both the registry and registrar levels, to create a secure and safe online environment for consumers and businesses alike and to preemptively safeguard against harm from preying criminals just waiting for opportunity to exploit and profit.

The New gTLD Program Committee (NGPC) responded to the GAC's warnings by implementing Public Interest Commitments (PICS) a process that they assured the GAC would protect consumers, regulatory authorities and provide binding, enforceable agreements which

respect the concerns of the GAC. PICs allowed registry applicants to add additional safeguards and enforcements mechanisms to their applications in order to add additional security and public safety mechanisms on opt of GAC standards.

As of present, both .SARL and .CREDITCARD domains are publicly available for registration. Both extensions have open registration policies which allow anyone to self-certify they have the authority to register .SARL and .CREDITCARD domains without registration verifications or cross-checks with governing authorities who oversee these designations, the very exact thing that the GAC warns against in all of their communiqués over the last two years. In a random sampling study, several .SARL and .CREDITCARD domains were purchased from the top 5 largest registrars, a including registrars affiliated by the registry operator of .SARL and .CREDITCARD. In fact, we found that donuts.sarl redirects to Donuts' home page, which we question they are authorized or organized as an official SARL in order to comply with Specification 11 of the Registry Agreement with ICANN. The study examined what, if any, verification or safeguards have been implemented to protect consumers. The results of the study were shocking. Out of all registrars sampled, not one contained any form of attestation, including a mandated click through box accepting any special terms, from the registrant that they were authorized by the appropriate governing entity to register such name. Further, the study found no direct information to inform the potential registrant of any specific restrictions around register a .SARL or .CREDITCARD domain name. All sampled registrars approved the .SARL and .CREDITCARD registrations and a website was published without any verification or validation, except for validation of the account email address post registration. Further, we saw no steps to implement any cross-checks of the registration(s) with the governing entity which authorizes or oversees such registrations in the appropriate jurisdiction. The conclusion of the study found that anyone can register a .SARL or .CREDITCARD name based on self certification of data and without any mechanism to check the integrity or validity of such data.

Nowhere in the .SARL or the .CREDITCARD Registry Agreement for operating these Category 1 strings is there any requirements for: (1) advance verification of an entities registration; (2) enforceable safeguards for fraudulent registrations; (3) collaboration with appropriate jurisdictional government entities to verify or maintain registration data accuracy; (4) or any accountable measures in relation to any online business identity misrepresentation that could occur based off the open registration of these domains. Public Interest Commitments (PICs) for both .SARL and .CREDITCARD (see attached) at best impose little burden on registrars to implement any technical mechanisms to validate or cross-check a potential registrant to ensure validity of registration data or authority by a regulatory to register the string.

In the most recent GAC advice issued at ICANN 51 in Los Angeles, CA, the GAC calls the NGPC to task with regards to not providing concrete responses to the GAC request for Category I strings (see https://gacweb.icann.org/display/gacweb/Governmental+Advisory+Committee), which states

Safeguard Advice Applicable to all new gTLDs and Category 1 (consumer protection, sensitive strings and regulated markets) and Category 2 (restricted registration policies) strings

The GAC remains concerned that the NGPC has not adopted certain specific GAC proposals on safeguards applicable to new gTLDs set forth in the London Communique. In its September 2, 2014 response to the GAC's advice and questions regarding implementation of the safeguards, the NGPC appeared to accept GAC advice and respond to the GAC's questions. In substance, however, the NGPC's response clearly indicates the NGPC believes certain elements of the GAC's advice would be challenging to implement. Moreover, the NGPC has deferred a concrete response on many key aspects of the implementation of the GAC advice.

The GAC raised vital consumer protection issues in the Beijing, Singapore, and, most recently, London Communiques, which help establish an environment of trust for these new domains as they are delegated. It is urgent to address these issues now because contracts for many new gTLDs have already been signed. Accordingly,

a. The GAC strongly advises the ICANN Board to focus its attention on the following:

i. Implementation of WHOIS Related-Safeguards

1. Provide the GAC with a comprehensive scorecard indicating steps and timelines regarding all streams of work related to the WHOIS accuracy safeguard;
2. Complete the Pilot study on WHOIS accuracy, including assessment of identity validation, and share the findings in a timely manner for review at the ICANN 52 meeting;
3. Initiate steps towards Phase 3 (identity verification) of WHOIS, including undertaking a cost-benefit analysis of implementation options; and
4. Commit to defining the process to address and resolve inaccurate WHOIS records and respond to non-compliance reports.

ii. Security Risks

1. Inform the GAC and provide GAC members an opportunity to contribute inter-sessionally about the ongoing consultation on the framework for Registries to respond to security risks;
2. Inform the GAC of the findings of this consultation no later than three weeks before the ICANN 52 meeting; and
3. Ensure an interim mechanism is in place to effectively respond to security risks.

iii. Public Interest Commitment Dispute Resolution Process

1. Modify the dispute resolution process to ensure that noncompliance is effectively and promptly addressed, in particular for cases requiring urgent action.

iv. Verification and Validation of Credentials for Category 1 Strings Associated with Market Sectors with Clear and/or Regulated Entry Requirements

1. Reconsider the NGPC's determination not to require the verification and validation of credentials of registrants for the highly regulated Category 1 new gTLDs. The GAC believes that for the limited number of strings in highly regulated market sectors, the potential burdens are justified by the benefits to consumers; reconsider the requirement to consult with relevant authorities in case of doubt about the authenticity of credentials; and reconsider the requirement to conduct periodic post-registration checks to ensure that Registrants continue to possess valid credentials; and
2. Ensure the issues (verification/validation; post-registration checks; consultation with authorities) are addressed in the review process for any subsequent rounds of new gTLDs.

v. Category 2 Safeguards: Ensuring Non-Descriminatory Registration Policies

1. Amend the PIC specification requirement for Category 2 new gTLDs to include a non-discriminatory requirement to provide registrants an avenue to seek redress for discriminatory policies.

This study provides tangible example of the NGPC's lack of concern and implementation of adequate security mechanisms in relation to consumer protection issues through the issuance of .SARL and .CREDITCARD without appropriate due diligence. It is not acceptable for the NGPC to act in ways that are detrimental to the overall stability and security of the Internet, especially which could result in widespread harm of Internet stakeholders, industry and consumers. With additional Category I strings getting delegated daily, the NGPC no longer has the luxury of applying a trial and error method of GAC Advice enforcement. Time is of the essence to act fast to avoid irreparable harm from occurring.

As an applicant for several corporate identifier extensions Dot Registry, LLC has devoted the last two years to solidifying verification and accountability mechanisms which uphold not only the pledges made in our applications, but additionally the GAC standards. Contrary to ICANN's core mission and values to promote the security and stability of the Internet, they have blatantly been opposed to our applications which serve to protect consumers, our community, and the Internet as a whole. By their purposeful and deliberate actions, it is unequivocally clear that ICANN nor the NGPC are going to take responsibility for ensuring adequate security measures are implemented for Category 1 strings. These clear and compelling examples in our study drive home the need for your immediate action in order to restore stability and security to the Internet in Category 1 string delegation and operation. ICANN needs to be held accountable for its actions and inactions and we look to you to bring this matter the proper attention deserved. Without it, we could not begin to even speculate the ripple effect this will have on the security and stability of the Internet moving forward. Now is the time to act, as ICANN highly desires to take over the IANA function, which will free ICANN from the oversight of the U.S. Department of Commerce.

Thank you for your time.

GAC Advice Response Form for Applicants

DOT REGISTRY LLC

Shaul Jolles
CEO