The Governmental Advisory Committee (GAC) has issued advice to the ICANN Board of Directors regarding New gTLD applications. Please see Section II of the GAC Buenos Aires Communiqué for the full list of advice on individual strings, categories of strings, and strings that may warrant further GAC consideration.

Respondents should use this form to ensure their responses are appropriately tracked and routed to the ICANN Board for their consideration. 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 Buenos Aires GAC Advice” (for example “1-111-11111 Response to Buenos Aires GAC Advice”). All GAC Advice Responses to the GAC Buenos Aires Communiqué must be received no later than 23:59:59 UTC on 06-January-2014.

Respondent:

<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Bharti Enterprises (Holding) Private Limited</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application ID</td>
<td>1-1287-43279</td>
</tr>
<tr>
<td>Applied for TLD (string)</td>
<td>BHARTI</td>
</tr>
</tbody>
</table>

Response:

Founded in 1976, by Sunil Bharti Mittal, Bharti Enterprises (Holding) Private Limited [popularly known as Bharti or Bharti Enterprises] has grown from being a manufacturer of bicycle parts to one of the largest and most respected business groups in India. With its entrepreneurial spirit and passion to undertake business projects that are transformational in nature, Bharti has created world-class businesses in telecom, financial services, retail and foods.

Bharti started its telecom services business by launching mobile services in Delhi (India) in 1995. Since then there has been no looking back and Bharti Airtel, the group’s flagship company, has emerged as one of top telecom companies in the world and is amongst the top five wireless operators in the world.

Through its global telecom operations Bharti group operates under the ‘Airtel’ brand in 19 countries across Asia and Africa– India, Sri Lanka, Bangladesh, Seychelles, Burkina Faso, Chad, Congo Brazzaville, Democratic Republic of Congo, Gabon, Ghana, Kenya, Madagascar, Malawi, Niger, Nigeria, Sierra Leone, Tanzania, Uganda and Zambia. In addition, the group also has mobile operations in Jersey, Guernsey.

Over the past few years, the group has diversified into emerging business areas in the fast expanding Indian economy. With a vision to build India’s finest conglomerate by 2020 the group has forayed into the retail sector by opening retail stores in multiple formats – small and medium - as well as establishing large scale cash and carry stores to serve institutional customers and other retailers. The group offers a complete portfolio of financial services – life insurance, general insurance
and asset management – to customers across India. Bharti also serves customers through its fresh and processed foods business. The group has growing interests in other areas such as telecom software, real estate, training and capacity building, and distribution of telecom and IT products.

What sets Bharti apart from the rest is its ability to forge strong partnerships. Over the years some of biggest names in international business have partnered with Bharti. Currently Singtel, IBM, Ericsson, Nokia Siemens and Alcatel-Lucent are our key partners in telecom. Axa Group is the partner for the financial service business and Del Monte Pacific for the processed foods division.

The mission of .bharti is to be the entry point for all ventures of Bharti – across geographies and businesses. It is to build brand recall and trust and build a seamless, consistent web experience. Numerous and often non-synergized conventions/cybersquatting in the existing TLDs may mislead our customers to various phishing/malicious web sites, leading to possible online fraud. Bharti wants to have an exclusive ownership of a TLD, as it intends to have complete control on the second-level domain names to have consistent presence worldwide for the brand Bharti and provide a certain comfort level to customers, thereby consolidating and simplifying its online identity. Bharti will be using .bharti exclusively for its group companies and products, services, campaigns, partners and customers of its group companies.

As stated in our application, Bharti Enterprises plans to invest in owning its own TLD (.bharti) in order to achieve the following key business goals and benefits:

1. Consistent web experience
2. Perception of enhanced security
3. Platform for global branding, marketing and visibility
4. Better Search Engine Optimization
5. Brand association for strategic partners
6. Platform for innovation
7. Linking products with a master brand
8. Shorter URLs
9. Phishing related costs/cybersquatting reduction
10. Excellent opportunity to secure online namespace

**Registry reserved names**

We will reserve the following classes of domain names, which will not be made available to registrants:
GAC Advice Response Form for Applicants

- All of the reserved names required in Specification 5 of the new gTLD Registry Agreement.
- The geographic names required in Specification 5 of the new gTLD Registry Agreement.
- The registry operator’s own name and variations thereof, and registry operations names (such as registry.tld, and www.tld), for internal use.
- Names related to ICANN and Internet standards bodies (iana.tld, ietf.tld, w3c.tld, etc.), for delegation of those names to the relevant organizations upon their request.
- The list of reserved names will be published publicly before the Sunrise period begins, so that registrars and potential registrants will know which names have been set aside.

**Conclusion**

Hence as described and explained above, Bharti Enterprises will be using the .bharti TLD exclusively for its group companies, products, services, campaigns and partners. Bharti appreciates the willingness of the ICANN Board to consider the company's response to the concerns raised by the GAC. Should the Board need additional information, the company would be happy to provide it.