



Comment on GAC Advice on New gTLDs

About Donuts Inc.

Donuts Inc. has applied for 307 generic top-level domains (gTLDs). Our gTLDs represent generic dictionary terms that we believe will fulfill ICANN's mission to introduce long-overdue consumer choice and competition to Internet naming. Donuts is a well-prepared and well-resourced company that is committed to offering consumers new and varied domain name alternatives through safe, stable and secure registry operations.

Donuts thanks the ICANN Board of Directors (Board) for the opportunity to respond to advice issued by the Governmental Advisory Committee (GAC), as documented in its Beijing Communiqué of 11 April 2013.

Organization of this comment on GAC Advice

This comment is provided in two parts:

- A suggested model for how the Board might organize, consider and respond to the GAC's advice.
- Donuts' own comments regarding the GAC's advice.

Executive Summary

Donuts appreciates the diligent effort of the GAC to ensure one of ICANN's core missions—the safe, secure and reliable operation of the domain name system—is well preserved during gTLD expansion, and the GAC's advice is received in that spirit.

The Board must not only consider the GAC's advice, it must do so in a manner that recognizes the correctly defined remit of the GAC and the interests of multiple parties with stakes in the new gTLD program, including end-users, registrants, investors, and applicants, who already have application agreements with ICANN, have been promised steady progress and predictability, and have participated already in decisions over many issues detailed in the GAC's communiqué.

Donuts believes the Board is in a position to accept the GAC's advice and implement many GAC recommendations, while making clear the full set of advice won't be adopted verbatim—rather, sections are subject to GAC clarification or, consistent with ICANN's bottom-up, consensus-based model, are subject to community review. Certain portions of GAC advice can be accepted as written, while others deserve community consideration and should apply to all gTLDs, if adopted. The Board also will recall many requests of the GAC have been debated and settled previously. Such requests to reconsider specific prior policy decisions at this point should be rejected to avoid causing delay to the new gTLD program. To revisit the very same policy decisions that were made by the Board after a full community process and after numerous consultations with the GAC—decisions that were relied on by applicants that invested hundreds of millions of dollars—would be anathema to the multi-stakeholder model that so many of us have fought to preserve.

As such, the Board should prioritize and handle issues as soon as possible, regard community guidance about what requires discussion or consensus, respect the community's significant expertise

10 May 2013

regarding issues of implementation, and reject previously decided policy issues. Further, the Board **must** maintain the current delegation timeline while considering how to best implement GAC advice.

With regard to GAC advice on gTLDs for which Donuts has applied, the company believes, again, that advice must not delay their advancement toward delegation, nor delay the overall program itself. The GAC should have provided rationale for its advice regarding the delay of specific strings—including .SPA, .VIN and .WINE,—as well as an opportunity to have been heard. At this point, the Board and GAC should not wait for the Durban meeting to make progress on these strings.

As always, Donuts respects the role of the GAC and other members of the community. However, the Board again is asked to revisit the development of new gTLD policy that was long ago finished, and further last-minute attempts to second-guess the Board's decisions regarding the program—particularly with policy and procedure requests that obviously are impractical or not fully thought out—are a waste of time that has become all too short. The Board and GAC should not cause further material harm to the program's applicants, which have been subject to innumerable delays, as well as to consumers that are seeking competition and choice. The Board is in a position to continue to advance the new gTLD program and meet ICANN's promises to all stakeholders.

Thesis

The thrust of Donuts' comments is the following:

- The Board should accept most of the GAC's advice and work towards implementation. Some can be implemented immediately, other recommendations will require more detailed implementation planning by the community, and others need more extensive community discussion where there is a policy or important implementation shift and should apply to all gTLDs.
- The Board should reject without debate or a lengthy process any advice that already was advised by the GAC, considered and rejected by the Board (after considerable analysis), and relied upon by the community.
- This set of GAC advice must not further delay the program.
- While new safeguards always should be considered, past decisions were carefully thought out. The current Guidebook contains a set of protections developed by security experts and honed during the GAC Scorecard process. Protection through categorization was extensively considered and rejected as unworkable.
- Applications for .SPA, .VIN and .WINE should not be delayed beyond Initial Evaluation as Donuts continues discussions with relevant GAC members.

I. Model for Board Response to GAC Advice

Donuts recognizes the Board will receive significant input on GAC advice, and reading, understanding and organizing that input in a way that doesn't denigrate or delay the program is very difficult. We also acknowledge the staff's hard work trying to maintain the program's already-delayed timeline.

Accordingly, we recommend that the Board:

1. Accept most of the GAC advice with the understanding advice will not be adopted verbatim, as implementation will have to be considered by the Board and the community. Decline any advice that already was made by the GAC and rejected by the Board.

Rationale

- a. The intent of the advice is to provide safeguards and increase DNS stability and security. This is a worthy objective.
 - b. Certain advice can be easily agreed to (RAA requirement, certain other unambiguous safeguards) and implemented. Many applicants, Donuts included, have made these a provision of their Public Interest Commitments (PICs).
 - c. Some advice requires additional implementation discussion, either to flesh out or tweak implementation detail or to consider whether a change in policy should be approved.
 - d. Outright rejection of GAC advice should be limited to cases in which the Board already rejected similar GAC advice and it should not trigger any requirement for the Board and GAC to wade through the red tape of additional consultation. Applicants should not endure an endless cycle of the same advice. Moving the proverbial goal posts after a decision is made and relied on would be unacceptable Board conduct.
2. Request that the GAC prioritize work on issues potentially put off until Durban—specifically the gTLD strings it seeks to “hold” pending Board-GAC discussion (Beijing Communiqué, Sec.1.a.i.ii.1) or further GAC deliberation (Sec.1.c.i).

Rationale

- a. GAC members provided Early Warnings for some strings, but not all; GAC rationale of any manner did not accompany consensus advice, which is owed to the Board and applicants.
 - b. Strings named in Sec.1.c of GAC advice should proceed beyond initial evaluation in order to keep the process on track. “The receipt of GAC advice will not toll the processing of any application (i.e., an application will not be suspended but will continue through the stages of the application process).” (Applicant Guidebook Sec.3.1.)
 - c. Because the GAC missed its own deadline for providing advice on specific strings, the Board is well justified in expecting the GAC to so prioritize.
3. On the basis of community input, segregate recommendations that are well understood and can be immediately implemented from those that should be rejected and those that require discussion or consensus. For the latter, the Board should describe an accelerated process for implementation on an issue-by-issue basis.

Rationale

Community discussion will include history of the issues already discussed and thus can be dispensed with. It further will indicate which GAC recommendations require examination based on policy or implementation considerations.

- a. Straightforward requirements (for example, general safeguard advice suggestions 1 and 2) will require implementation work to ensure consistency across all gTLDs and a meaningful outcome.
 - b. Some concerns (e.g., Whois) are the subject of ongoing community work; GAC recommendations could be implemented, but are better left to inform existing the working group's holistic approach.
4. Understand that the re-introduction of categories is problematic and must be rejected, but certain category advice may be worthwhile and should apply to all gTLDs.

Rationale

- a. The GAC has re-introduced previously-rejected ideas (category safeguard recommendations 6-8) that would hobble innovation, significantly increase end-user costs, and harm business models developed in reliance on the approved Final Applicant Guidebook. Such blanket restrictions would create an uneven playing field and reduce the benefits the program seeks to provide.
- b. The introduction of safeguards by category was discussed but not adopted during the GAC "scorecard era" as they were determined to be unworkable and unenforceable

As the Board stated in the final version of the GAC scorecard:

"It is true that the Board has rejected the idea that community name definitions be expanded to include other sectors and regulated business...Expansion of categories in a clear way is extremely difficult. This is reflected in the public comment received. Community definitions have been drawn narrowly in the Guidebook to prevent abuses. Even expansion of categories will probably not address GAC concerns in come way as even the expanded definition might leave some genuine area of sensitivity unaddressed."¹

- c. The program was approved with this understanding. Another bite at this apple is unwarranted as no compelling rationale is provided for reintroduction.
 - d. Some category safeguards advocated by the GAC could reasonably apply to all gTLDs (i.e., not only new gTLDs), negating the need for categorization. (Example: requiring protection of confidential information is a reasonable requirement for all gTLDs.)
5. As ICANN's ultimate decision authority, inform the GAC that the gTLD process will not be delayed pending the results of discussions, except for the specific strings listed in Sec. 1.A of GAC advice.

Rationale

It is critical to maintain the current delegation timeline while considering how to implement GAC advice.

- a. Success or failure to adhere to the timeline will have reputational impacts: ICANN entities are not seen discretely; to relative outsiders, GAC activity, Board arbitration of various stakeholder interests and ICANN staff execution are seen all together. It's important for all to work together to provide sensible governance and avoid delays that provide ammunition for ICANN opponents.

¹ board-notes-gac-scorecard-clean-15apr11-en-2.pdf

ICANN should not have to say, “Staff were prepared to meet goals but governmental stakeholders delayed the program to change controls that were already decided.” This is akin to saying “ICANN would have met its objectives, except for the acts of ICANN.”

- b. Most GAC advice falls outside that described in the AGB, and therefore should not delay the program. GAC advice on *particular* strings in accordance with Sec 3.1(iii) must be strictly followed.
- c. Certain Safeguard Advice that arrived after the AGB was approved and the process launched are rehashes of previously raised issues that were exhaustively covered by experts, and strengthened by the GAC’s Scorecard effort.
- d. While the GAC may provide advice at any time, it must be considered with urgency, while work toward delegation proceeds in parallel. The AGB states: **“The receipt of GAC advice will not toll the processing of any application (i.e., an application will not be suspended but will continue through the stages of the application process).”** (Emphasis added)

In the context of ICANN’s goal to advance competition in the domain name industry, Donuts believes some suggestions deserve policy consideration to ensure applicability to all gTLDs, new and existing. This is consistent with the NTIA’s recent letter to ICANN, which states in part:

“We encourage ICANN to explore additional . . . protections across all TLDs, existing and new, through community dialogues and appropriate policy development processes in the coming year.”

<http://www.icann.org/en/news/correspondence/strickling-to-crocker-04oct12-en.pdf>

The final result should be that many, but not all of the elements of the GAC Communiqué are implemented at the time of launch in some form, while others go through some process to apply to all gTLDs.

II. Donuts Comments on GAC Advice

Donuts respectfully underscores to the Board that the new gTLD program has been entirely developed over a long period of years (including significant contributions from the GAC), satisfying the objective of providing a healthy ecosystem for innovation, consumer choice and competition, while providing a safe environment for those who use the Internet and protecting the interests of multiple stakeholders. Our comments reflect these objectives and are the foundation for the rationale for our input.

Donuts has invested more than \$57 million in application fees alone, and has participated extensively in development of the new gTLD program. Donuts, and other applicants, have met every deadline and requirement put forth by ICANN, while various ICANN entities have missed deadlines, made decisions without community consultation, issued multiple last-minute demands, and otherwise bowed to pressure from parties interested only in delay.

Against the backdrop of a completely prepared gTLD expansion program, the GAC's Beijing advice is extraordinarily overbroad and is not limited (as mandated in the AGB) to specific strings. Donuts applications are mentioned in the category recommendations an astoundingly high number of times, which is remarkable considering that our applications were for purely generic terms and designed to avoid the governmental sensitivities identified in the AGB.

Had applicants known the GAC would attempt to extend its mandate beyond what it previously agreed to, perhaps their participation in the program would have been different. The current program was approved after many years of discussion, taking into account the GAC principles, GAC Communiqués, and the effort known as the GAC Scorecard (where many of the issues raised here were settled). Ultimately, however, fairness should prevail and applicants like Donuts (who relied on Board assurances that new gTLD policy was finalized at the time of application and the GAC Principle related to applicant certainty²) should not be reasonably expected to make significant last-minute changes to business plans by agreeing to complicated policies issued in a top-down manner and that present unreasonable implementation barriers.

Having said that, there is possibility for compromise and discussion. Donuts finds many of the GAC recommendations acceptable as is, while others can be accepted for community discussion. That discussion might further identify and refine operational details or could require broader policy discussion.

Donuts recommends the Board take the following actions:

1. Implement GAC advice pertaining to:
 - a. usage of registrars operating under the 2013 Registrar Accreditation Agreement (RAA);
 - b. GAC principles on Whois being taken into account by the Directory Services Expert Working Group;
 - c. making permanent the protections for International Olympic Committee (IOC) and Red Cross/Red Crescent (RCRC) at the top level prior to delegation of new gTLDs; and
 - d. protecting full names of IGOs at the top and second levels. (Donuts does not agree with full second-level reservation of IGO acronyms, but agrees with the Registry Stakeholder Group's proposal to add acronyms to the Trademark Clearinghouse, making them eligible for Sunrise and claims protections.)

² GAC Principle 2.5, which states, in part: "All applicants for a new gTLD registry should therefore be evaluated against transparent and predictable criteria, fully available to the applicants prior to the initiation of the process."

Rationale

More than one party can legitimately use many acronyms, including those documented by the GAC in its recommendations regarding IGO protections. Donuts supports enabling IGOs, at their option, to register their acronym names into the TMCH and utilize the mandatory Sunrise and claims processes based on individual registry requirements, similar to the treatment of validated trademarks. In accordance with existing TMCH rules, priority should not be assigned to IGOs ahead of trademark holders; names instead should be allocated in sunrise to competing parties according to registration requirements of that registry. Doing so grants IGOs the same enhanced rights that trademark holders enjoy under the AGB, provides IGOs and trademark holders “first crack” at acronyms in unrestricted gTLDs, and is ultimately the most equitable and practical method for all parties.

2. Advice pertaining to safeguards, in addition to those already negotiated with the GAC and included with the AGB, should be addressed by the Board after a community discussion, separate from the new gTLD program. (See discussion on specific safeguards below.)

Rationale

ICANN has a duty to include all impacted parties in a discussion of policy outcomes and implementation outcomes. Also, community discussion will ensure fair implementation.

3. With regard to advice on specific strings (.SPA, .WINE, .VIN), the GAC’s process lacked transparency and it failed to provide any rationale for holding these applications. The applications should proceed beyond Initial Evaluation.

Rationale

- a. Having received Early Warnings on .VIN and .WINE applications, Donuts held productive discussions with governmental representatives from France and Luxembourg regarding appropriate safeguards, and at the invitation of these governments, will continue discussions related to any potential accommodations.
 - b. Donuts received no Early Warning for .SPA, and the GAC provided no rationale for the GAC seeking to delay this application. The AGB *must* have contemplated that the GAC would provide rationale on which to base a reply. If the GAC’s concern is that Donuts’ intention is to employ the gTLD as a city name (as detailed in the AGB), we refer the Board to Donuts’ application for .SPA—our intention clearly is not to do so.
 - c. The GAC seeks to delay consideration of these applications without providing justification, making an informed response impossible.
4. There is no demonstrated need to re-examine simultaneous existence of singular and plural versions of a string.

Rationale

- a. The GAC asks the Board to “Reconsider its decision to allow singular and plural versions of the same strings.” However, this was not a Board decision. The Board approved the evaluation process, which included independent assessment of each application against AGB criteria, appropriately away from the interests of those with stakes in the outcome.
- b. The findings of the independent string similarity review panel should not be upset, absent a finding of mis- and malfeasance. The GAC cannot replace the evaluators’ opinions with that of its own.
- c. ICANN should not open the door to one stakeholder group undoing independently arrived-at results because that stakeholder group doesn’t care for the outcome.

- d. Substantively, ICANN risks marginalizing the utility of the naming spectrum.³
5. While recognizing the GNSO has undertaken policy work relating to International Governmental Organization (IGO) names and acronyms, the Board should be prepared to make decisions quickly about the eventual employment of these terms.

Rationale

- a. The GAC has admitted that implementation is difficult. The issue now is actively under consideration of a GNSO working group, which is nearing completion of recommendations. This discussion appropriately belongs—in the hands of all impacted parties and implementation experts. More than one potential solution has been offered, and the Board should expect a working group recommendation soon. (See Donuts input: <http://forum.icann.org/lists/gnso-igo-ingo/msg00613.html>)
 - b. In the AGB, the Board implemented the previous, explicit GAC advice that “no additional protections should be afforded to IGOs.” (<http://www.icann.org/en/news/correspondence/dryden-to-crocker-icann-board-12apr12-en>)
 - c. The Board described (and the GAC agreed that there were) implementation problems with IGO/INGO protection, finding more than 100 collisions in just 13 of the GAC’s recommended IGO acronyms. (<http://www.icann.org/en/news/correspondence/crocker-to-dryden-01apr13-en>)
 - d. The Board further highlighted the difficulty, if not impossibility, of implementing the GAC’s advice as written. (<http://audio.icann.org/meetings/beijing2013/gac-board-09apr13-en.mp3>)
 - e. The GNSO is considering this issue, including participation from those who understand the implementation challenges. More than one potential solution has been offered, and the Board should expect a working group recommendation soon. (See Donuts input: <http://forum.icann.org/lists/gnso-igo-ingo/msg00613.html>)
6. The requirement that registries use only registrars that have signed the 2013 RAA is acceptable.

Rationale

Donuts supports the adoption of the currently proposed RAA and Registry Agreement, which already contains this requirement.

³ Donuts agrees with this comment by a fellow applicant: “By limiting singular and plurals, ICANN would be marginalizing the utility of the naming spectrum and ... the success of the entire new GTLD exercise. The public expects to find singulars AND plurals and causing that public to find some and not others, will make navigation more confusing. In the long run it creates more errors in search, benefiting search engines and weakens the utility of the naming spectrum as a natural navigation medium. Internet users will continue to search for plurals; they will simply fail to the browser’s default search. Search wins and names lose.” <http://forum.icann.org/lists/comments-gac-safeguard-advice-23apr13/msg00006.html>

7. It should adopt certain new protections sought by the GAC (GAC Beijing Communiqué Sec. V.1.b. and Annex I—Safeguards Applicable to All New gTLDs) after expedited consultation and discussion with the community.

Rationale:

- a. Abuse mitigation measures and other protections were thoroughly discussed and implemented by experts in the working group staffed by the APWG, RISG, IRT, STI and others. Their work results were later examined and enhanced by the GAC during the scorecard deliberations, then eventually included in the approved AGB.
- b. Many of the protections referred to by the GAC are already addressed in the AGB and registry contract.
- c. Many also have been further enhanced by registry operators themselves.
- d. Additional protections sought by the GAC should have the benefit of review by community experts, which should occur outside the new gTLD program and not delay delegations.
- e. With standard, clearly written and enforceable PIC Specs, ICANN can enforce terms through its compliance function instead of a third-party dispute resolution provider, creating efficiency.
- f. A standard set of commitments inserted into the contract would create a level playing field for all applicants.

Donuts' input on "Safeguards Applicable to all New gTLDs" (Beijing Communiqué, pp. 7-8)

Recommendation 1: Whois verification and checks

Donuts has committed to this function in its application and PIC Specs, and therefore is in favor of the Board implementing a standard PIC on this issue.

Recommendation 2: Mitigating abusive activity

Donuts has committed to this function in its application and PIC Specs, and therefore is in favor of its adoption through a standard PIC. It should be remembered that ICANN convened a group of industry experts (including APWG and RISG members) to develop and implement a set of mitigation measures that were included in the Guidebook and discussed during the GAC Scorecard.

Recommendation 3: Security checks

For gTLDs we determined were sensitive or otherwise deserved heightened security attention, Donuts committed to this function in its application and PIC Specs, and therefore, for similarly sensitive strings, is in favor.

Recommendation 4: Documentation

Donuts is in a position to adopt this safeguard were the Board to adopt them after a community discussion provides clarity and consensus. The Board should accept the GAC recommendation and forward it to the currently operating Whois working group for consideration.

Recommendation 5: Making and handling complaints

Registrant points of contact are listed in the Whois information and recommend that this new role for the point of contact be discussed in the Whois working group. Again, there are operational considerations to be worked out: who is the point of contact, for example, for the major insurers with, potentially, thousands of callers?

Recommendation 6: Consequences

GAC advice seems to state that responsibility for applying consequences should be shifted to the registry and consequences are mandatory in all cases. The idea has merit, but Donuts reminds the Board it is the registrar that has the direct customer relationship, and further, that mandatory consequences carry the risk of being misapplied.

Donuts recommends the Board accept the GAC's advice and combine this community discussion with those of the Whois working group.

8. Categorization, as proposed by the GAC is overbroad and unworkable. Applying safeguards according to categories of gTLDs is problematic, was previously rejected in community work and by the Board, and would limit new gTLD benefit and utility. With that said, some of these suggested safeguards could be adopted for all gTLDs after community review. Others must be rejected outright.

Rationale:

- a. It is impossible to define a difference between names that are susceptible to abuse and those that aren't. As the Board stated in the final version of the GAC scorecard:

"It is true that the Board has rejected the idea that community name definitions be expanded to include other sectors and regulated business...Expansion of categories in a clear way is extremely difficult. This is reflected in the public comment received. Community definitions have been drawn narrowly in the Guidebook to prevent abuses. Even expansion of categories will probably not address GAC concerns in come way as even the expanded definition might leave some genuine area of sensitivity unaddressed."⁴

- b. Placing limitations on gTLDs before they're launched, solely in anticipation of a possible type of abuse, will stifle innovation. As the Board said:

"Significant consideration has been given to the issue of introducing category-based TLDs in the new gTLD process. ICANN remains a strong proponent of innovative uses of new TLDs. This is especially so in cases where TLDs can be delegated to address the needs of specific communities such as intergovernmental organizations, socio-cultural groups and registered brands. Rather than having ICANN limit this type of innovation and identification with certain TLD models, more creativity might be spawned by allowing different groups to self-identify the type of TLD they purport to be and promote that model among their community."⁵

⁴ board-notes-gac-scorecard-clean-15apr11-en-2.pdf

⁵ Summary-analysis-agv4-12nov10-en.pdf

i. Example: .ARCHITECT

Limiting this gTLD to licensed structural architects denies legitimate usage by software architects⁶, landscape architects, and others. Such a limitation would disenfranchise “minority” uses of the term.

- c. Categorical restrictions on some and not other gTLDs hobbles competition and creates an uneven playing field.
- d. Contractual compliance is problematic. Under which set of circumstances does a label attain “category” status? Under which is it excused of additional obligations?

Donuts input on specific recommendations (Beijing Communiqué, pp 8-10, GAC advice in italics):

Strings that are linked to regulated or professional sectors should operate in a way that is consistent with applicable laws.

Donuts believes all gTLDs must operate within applicable law. We do not believe, however, that registries should act as law enforcement.

Recommendation 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.

Registrants must operate within the law and that requirement can be passed down to them but registries should not be put in investigative or law enforcement roles. It is very unlikely, for example, that registry operators know anything substantive about organic farming. This requirement should be included in the recommendations for all gTLDs.

Recommendation 2: Registry operators will require registrars at the time of registration to notify registrants of this requirement.

Donuts agrees with this recommendation. This requirement should be included in the recommendations for all gTLDs.

Recommendation 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.

After community discussion to determine the correct wording, a form of this requirement can be passed down. Note that handling of this data seems to occur effectively in .COM and other TLDs where there are less stringent requirements: those registering second-level names are successful at maintaining confidential data—or they fail.

⁶ The Board itself enjoys the expertise of a liaison from the Internet **Architecture** Board: <http://www.iab.org/2013/04/11/iab-appoints-jonne-soininen-as-liaison-to-the-icann-board/>

Recommendation 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.

Donuts will maintain close working relationships with relevant authorities as necessary. However, we advise the Board this creating such a requirement could be very impractical—how would one know, for example, which regulatory body oversees farming, retail sales, and quality control for registrants using .FLORIST. These bodies might not be responsive to collaboration. This recommendation should be appropriately scaled.

Recommendation 5: Registrants must be required by the registry operators to notify to them (sic) 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.

We think the registrants' points of contact are listed in the Whois information and recommend that this new role for the point of contact can be discussed in the Whois working group. Again, there are operational considerations to be worked out.

The GAC goes on to state, "*strings may require further targeted safeguards, to address specific risks. 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.*"

GAC use of language "may," "should" and "some" implies that these are GAC recommendations to be considered.

Recommendations 6-8 are addressed together:

Recommendation 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.

Recommendation 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.

Recommendation 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.

We find this last set of recommendations to be highly problematic. They place registrar duties upon the registry. More importantly, they restrict registry operations in a way that might be unworkable in many circumstances.

TLDs can target different registrants other than licensed professionals. TLDs such as .CASH, .LEASE and .HEALTH can be safely operated without onerous conditions or restrictions. (Currently, health.com is operated by a U.S. based magazine and presumably provides very useful information to its readers.) Donuts has put safeguards in place (and as is evidenced above, willing to consider more) to ensure

stable operation of the registry and protection of registrants and users.

Donuts advises the Board that these requests present significant operational difficulties:

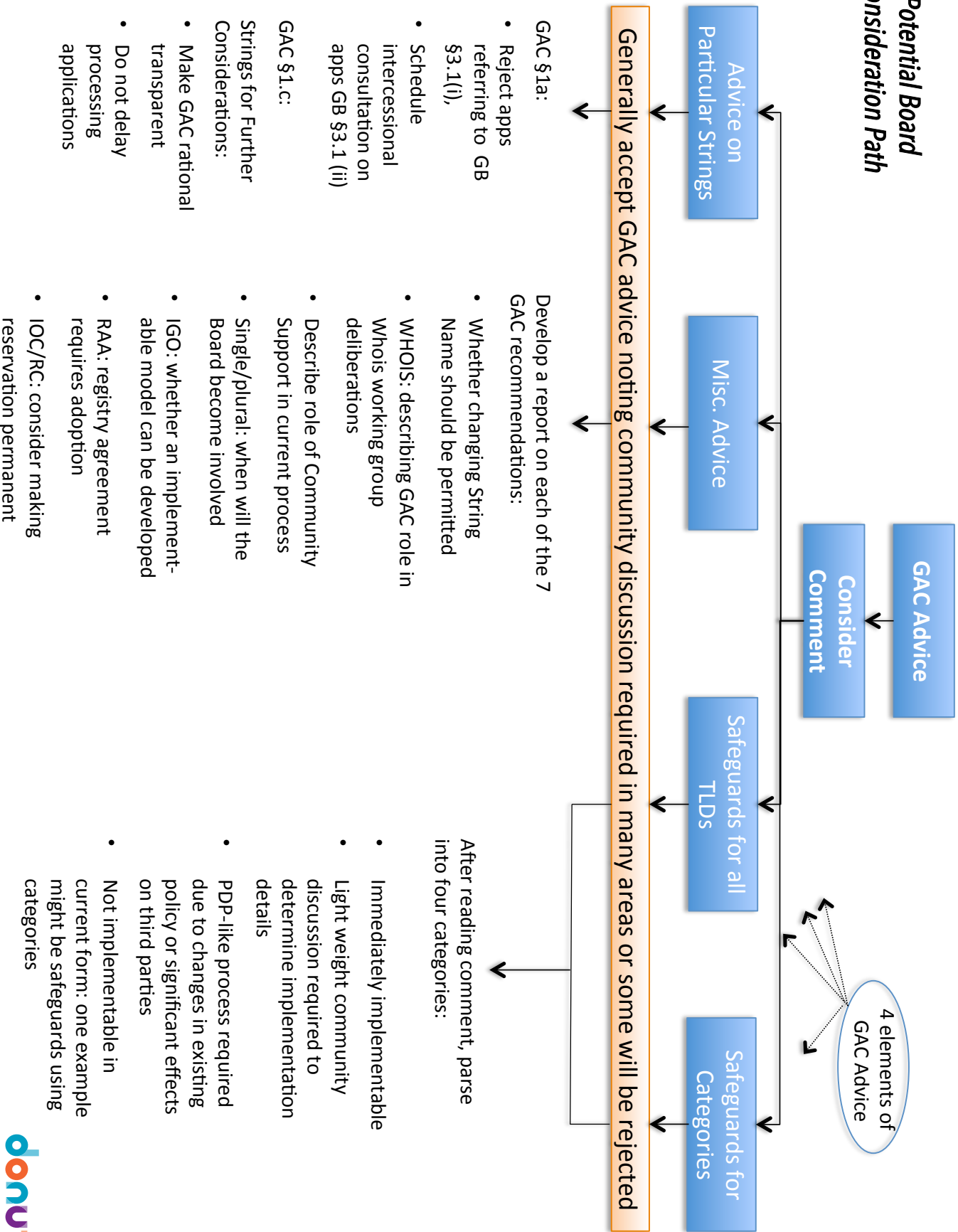
- They significantly change the registration experience of the end-user, from the ability to register a name now to requesting a name and having it granted only after permission is secured from one of potentially thousands of bodies with interests in regulating speech and content.
- They may violate data protection and privacy laws in multiple jurisdictions.
- They would require the cooperation of governments and other authorities, as well as the above-mentioned thousands of various credentialing bodies, to secure private identity data and provide it to registrars.

Obviously, these GAC recommendation must be rejected.

Summary

Donuts appreciates the opportunity to comment. Understanding the Board will have hundreds of these comments to read, Donuts is submitting this one comment on behalf of all our applications. We would appreciate the opportunity to explain our viewpoints and reasoning more fully at any time and at the Board's convenience.

Potential Board Consideration Path



GAC Advice

Advice on Particular Strings

Misc. Advice

Safeguards for all TLDs

Safeguards for Categories

- SPA
GAC has provided no Early Warning or rationale for delaying this application. The GAC should make that rationale transparent now and the Board should not delay application processing.
- Changing String Name
AGB prohibition backed by sound reasoning
- WHOIS
Whois working Group should consult with the GAC early & often
- Community Support
Addressed in the AGB objection & CPE
- Single/plural follow existing processes
- IGO reserve full IGO names; allow acronyms in TMCH
- RAA agree with GAC
- IOC/RC make reservation permanent
- Whois verification
- Mitigating abuse
- Security checks
- Documentation
- Handling complaints
- Consequences
- These concepts can be negotiated by the parties to the agreement and incorporated into the registry agreement as standard PICs and enforced by ICANN
- Categories were decided unworkable in Scorecard. However, some safeguards might be implemented for all TLDs
- Consumer Protection, Sensitive Strings, and Regulated Markets
- Some protections can be implemented for all TLDs. Community discussion is req'd to clarify roles of registries & registrars. Defining any segment (say "architect" or "lawyer" is problematic).
- Restricted or exclusive access
- Should not clash with bona fide business models created in reliance on AGB



#	Application Number	Applicant Name	Email Address
1	1-1336-51768	Half Oaks, LLC	halfoaks@donuts.co
2	1-1340-40734	Knob Town, LLC	knobtown@donuts.co
3	1-1339-13106	Steel Falls, LLC	steelfalls@donuts.co
4	1-1341-21066	June Maple, LLC	junemaple@donuts.co
5	1-1343-89689	Lone Maple, LLC	lonemaple@donuts.co
6	1-1342-7920	Spring Frostbite, LLC	springfrostbite@donuts.co
7	1-1344-70608	Baxter Tigers, LLC	baxtertigers@donuts.co
8	1-1345-27582	Baxter Hill, LLC	baxterhill@donuts.co
9	1-1348-99321	Victor North, LLC	victornorth@donuts.co
10	1-1347-98883	Sand Galley, LLC	sandgalley@donuts.co
11	1-1349-23181	Holly Castle, LLC	hollycastle@donuts.co
12	1-1351-20019	Big Maple, LLC	bigmaple@donuts.co
13	1-1352-18081	Auburn Beach, LLC	auburnbeach@donuts.co
14	1-1350-42613	Auburn Hollow, LLC	auburnhollow@donuts.co
15	1-1354-34421	Half Hollow, LLC	halfhollow@donuts.co
16	1-1353-23613	Silver Pass, LLC	silverpass@donuts.co
17	1-1355-53565	Little Hollow, LLC	littlehollow@donuts.co
18	1-1356-74155	Romeo Corner, LLC	romeocorner@donuts.co
19	1-1359-21671	Foggy Way, LLC	foggyway@donuts.co
20	1-1357-41903	Grand Hollow, LLC	grandhollow@donuts.co
21	1-1360-70873	Sand Cedar, LLC	sandcedar@donuts.co
22	1-1358-79189	Corn Shadow, LLC	cornshadow@donuts.co
23	1-1362-58076	Black Shadow, LLC	blackshadow@donuts.co
24	1-1361-60591	Double Bloom, LLC	doublebloom@donuts.co
25	1-1363-29181	Over Galley, LLC	overgalley@donuts.co
26	1-1365-11798	Goose North, LLC	goosenorth@donuts.co
27	1-1364-8001	Spring North, LLC	springnorth@donuts.co
28	1-1366-121	Atomic Madison, LLC	atomicmadison@donuts.co
29	1-1367-68057	Spring Cross, LLC	springcross@donuts.co
30	1-1368-92181	Bitter Sunset, LLC	bittersunset@donuts.co

31	1-1371-6431	Half Sunset, LLC	halfsunset@donuts.co
32	1-1370-88467	Pioneer Canyon, LLC	pioneercanyon@donuts.co
33	1-1372-58656	Atomic Maple, LLC	atomicmaple@donuts.co
34	1-1373-83008	Delta Dynamite, LLC	deltadynamite@donuts.co
35	1-1375-20218	Delta Mill, LLC	deltamill@donuts.co
36	1-1376-34668	Foggy Hollow, LLC	foggyhollow@donuts.co
37	1-1374-92093	Goose Cross, LLC	goosecross@donuts.co
38	1-1378-74207	Wild Corner, LLC	wildcorner@donuts.co
39	1-1377-8759	Koko Castle, LLC	kokocastle@donuts.co
40	1-1379-61100	Extra Way, LLC	extraway@donuts.co
41	1-1381-76948	Delta Lake, LLC	deltalake@donuts.co
42	1-1382-33633	Binky Sky, LLC	binkysky@donuts.co
43	1-1380-59591	New Falls, LLC	newfalls@donuts.co
44	1-1383-13918	Tin Mill, LLC	tinmill@donuts.co
45	1-1384-49318	Corn Lake, LLC	cornlake@donuts.co
46	1-1385-24288	Sand Fields, LLC	sandfields@donuts.co
47	1-1388-22552	Sand Cover, LLC	sandcover@donuts.co
48	1-1387-59691	Holly Fields, LLC	hollyfields@donuts.co
49	1-1389-12139	Snow Sky, LLC	snowsky@donuts.co
50	1-1390-429	Black Corner, LLC	blackcorner@donuts.co
51	1-1391-32771	Fox Shadow, LLC	foxshadow@donuts.co
52	1-1392-58392	Goose Park, LLC	goosepark@donuts.co
53	1-1394-96113	Steel Lake, LLC	steellake@donuts.co
54	1-1393-18458	Dash Cedar, LLC	dashcedar@donuts.co
55	1-1396-86079	Koko Manor, LLC	kokomanor@donuts.co
56	1-1397-64766	Koko Island, LLC	kokoisland@donuts.co
57	1-1398-14114	Puff Willow, LLC	puffwillow@donuts.co
58	1-1401-49222	Trixy Cover, LLC	trixycover@donuts.co
59	1-1400-95244	Binky Edge, LLC	binkyedge@donuts.co
60	1-1402-32002	Fox Orchard, LLC	foxorchard@donuts.co
61	1-1399-64977	Silver Avenue, LLC	silveravenue@donuts.co
62	1-1405-67595	Pine Mill, LLC	pinemill@donuts.co
63	1-1404-98894	Pine House, LLC	pinehouse@donuts.co
64	1-1403-98045	Fox Dynamite, LLC	foxdynamite@donuts.co
65	1-1406-80949	Pixie Station, LLC	pixiestation@donuts.co
66	1-1408-96304	Magic Woods, LLC	magicwoods@donuts.co

67	1-1409-69124	Koko Lake, LLC	kokolake@donuts.co
68	1-1407-41397	Cotton Fields, LLC	cottonfields@donuts.co
69	1-1413-96740	Black Island, LLC	blackisland@donuts.co
70	1-1411-59458	Trixy Canyon, LLC	trixycanyon@donuts.co
71	1-1410-93823	Snow Shadow, LLC	snowshadow@donuts.co
72	1-1412-63109	Binky Frostbite, LLC	binkyfrostbite@donuts.co
73	1-1414-81052	Little Cover, LLC	littlecover@donuts.co
74	1-1415-46513	Spring Way, LLC	springway@donuts.co
75	1-1416-56404	Pine Fest, LLC	pinefest@donuts.co
76	1-1419-43874	Sand Sunset, LLC	sandsunset@donuts.co
77	1-1418-57248	Puff House, LLC	puffhouse@donuts.co
78	1-1420-57575	Steel Station, LLC	steelstation@donuts.co
79	1-1421-91857	Tin Birch, LLC	tinbirch@donuts.co
80	1-1422-97537	Outer Lake, LLC	outerlake@donuts.co
81	1-1425-38025	Black Avenue, LLC	blackavenue@donuts.co
82	1-1428-32844	John Edge, LLC	johnedge@donuts.co
83	1-1426-25607	Pioneer Hill, LLC	pioneerhill@donuts.co
84	1-1427-39640	Dash Park, LLC	dashpark@donuts.co
85	1-1424-94823	Half Trail, LLC	halftrail@donuts.co
86	1-1432-79618	Extra Madison, LLC	extramadison@donuts.co
87	1-1431-6328	Holly Hill, LLC	hollyhill@donuts.co
88	1-1430-52453	Brice Trail, LLC	bricetrail@donuts.co
89	1-1429-22494	Koko Mill, LLC	kokomill@donuts.co
90	1-1433-39728	Sugar Cross, LLC	sugarcross@donuts.co
91	1-1434-1370	Little Birch, LLC	littlebirch@donuts.co
92	1-1435-73490	Brice Way, LLC	briceway@donuts.co
93	1-1438-98374	Spring Madison, LLC	springmadison@donuts.co
94	1-1437-42738	Binky Birch, LLC	binkybirch@donuts.co
95	1-1436-74788	Romeo Canyon, LLC	romeocanyon@donuts.co
96	1-1440-71720	Snow Oaks, LLC	snowoaks@donuts.co
97	1-1442-68106	Corn Station, LLC	cornstation@donuts.co
98	1-1441-44965	Trixy Park, LLC	trixypark@donuts.co
99	1-1443-27992	Pioneer Maple, LLC	pioneermapple@donuts.co
100	1-1445-684	Spring Falls, LLC	springfalls@donuts.co
101	1-1444-46322	Magic Pass, LLC	magicpass@donuts.co
102	1-1446-82057	Victor Beach, LLC	victorbeach@donuts.co

103	1-1447-46365	Sea Sunset, LLC	seasunset@donuts.co
104	1-1448-73190	Atomic Pipe, LLC	atomicpipe@donuts.co
105	1-1450-96002	Bitter Galley, LLC	bittergalley@donuts.co
106	1-1449-26710	Goose Glen, LLC	gooseglen@donuts.co
107	1-1451-8324	Just Maple, LLC	justmaple@donuts.co
108	1-1455-48217	Big Dynamite, LLC	bigdynamite@donuts.co
109	1-1452-20905	Outer Avenue, LLC	outeravenue@donuts.co
110	1-1454-18725	Cotton Cypress, LLC	cottoncypress@donuts.co
111	1-1453-71764	Just Cover, LLC	justcover@donuts.co
112	1-1459-49079	Fox Woods, LLC	foxwoods@donuts.co
113	1-1457-79967	Brice Orchard, LLC	briceorchard@donuts.co
114	1-1460-3791	Fox Station, LLC	foxstation@donuts.co
115	1-1456-34878	Half Cypress, LLC	halfcypress@donuts.co
116	1-1458-34042	Fern Willow, LLC	fernwillow@donuts.co
117	1-1462-36448	Wild Orchard, LLC	wildorchard@donuts.co
118	1-1463-19656	Foggy Farms, LLC	foggyfarms@donuts.co
119	1-1461-35653	Sea Oaks, LLC	seoaks@donuts.co
120	1-1464-71170	June Hollow, LLC	junehollow@donuts.co
121	1-1468-64201	John Dale, LLC	johndale@donuts.co
122	1-1465-93738	Over Keep, LLC	overkeep@donuts.co
123	1-1467-34522	John Castle, LLC	johncastle@donuts.co
124	1-1466-60532	Lone Fields, LLC	lonefields@donuts.co
125	1-1469-89174	Atomic Falls, LLC	atomicfalls@donuts.co
126	1-1471-10955	Sugar House, LLC	sugarhouse@donuts.co
127	1-1470-40168	Foggy Beach, LLC	foggybeach@donuts.co
128	1-1472-69003	Brice Maple, LLC	bricemaple@donuts.co
129	1-1474-76888	Goose Sky, LLC	goosesky@donuts.co
130	1-1475-74719	Black Cover, LLC	blackcover@donuts.co
131	1-1473-54534	Goose Falls, LLC	goosefalls@donuts.co
132	1-1477-91047	Extra Dynamite, LLC	extradynamite@donuts.co
133	1-1478-71326	June Edge, LLC	juneedge@donuts.co
134	1-1476-38656	Lone Falls, LLC	lonefalls@donuts.co
135	1-1479-5306	Over Madison, LLC	overmadison@donuts.co
136	1-1481-2922	Pioneer Tigers, LLC	pioneertigers@donuts.co
137	1-1486-63504	Corn Sunset, LLC	cornsunset@donuts.co
138	1-1482-30833	Romeo Town, LLC	romeotown@donuts.co

139	1-1484-33046	Snow Moon, LLC	snowmoon@donuts.co
140	1-1487-73268	Pioneer Cypress, LLC	pioneercypress@donuts.co
141	1-1488-15641	Pixie Edge, LLC	pixieedge@donuts.co
142	1-1489-82287	Goose Fest, LLC	goosefest@donuts.co
143	1-1492-32589	Silver Glen, LLC	silverglen@donuts.co
144	1-1499-91633	Pioneer Gardens, LLC	pioneergardens@donuts.co
145	1-1493-98462	Half Willow, LLC	halfwillow@donuts.co
146	1-1496-1524	John Madison, LLC	johnmadison@donuts.co
147	1-1497-56699	Goose Woods, LLC	goosewoods@donuts.co
148	1-1494-83305	Baxter Pike, LLC	baxterpike@donuts.co
149	1-1505-15195	Ruby Pike, LLC	rubypike@donuts.co
150	1-1507-65003	Trixy Birch, LLC	trixybirch@donuts.co
151	1-1498-82780	Auburn Hill, LLC	auburnhill@donuts.co
152	1-1500-16803	Spring McCook, LLC	springmccook@donuts.co
153	1-1506-83794	Sugar Park, LLC	sugarpark@donuts.co
154	1-1511-99612	Auburn Bloom, LLC	auburnbloom@donuts.co
155	1-1271-68369	Baxter Sunset, LLC	baxtersunset@donuts.co
156	1-1510-3058	Outer House, LLC	outerhouse@donuts.co
157	1-1514-76062	Outer Maple, LLC	outermaple@donuts.co
158	1-1512-20834	Auburn Park, LLC	auburnpark@donuts.co
159	1-1516-617	Pioneer Willow, LLC	pioneerwillow@donuts.co
160	1-1513-9603	Wild Way, LLC	wildway@donuts.co
161	1-1521-75718	Holly Glen, LLC	hollyglen@donuts.co
162	1-1520-93221	Wild Bloom, LLC	wildbloom@donuts.co
163	1-1522-61364	Goose Gardens, LLC	goosegardens@donuts.co
164	1-1526-71442	Just Goodbye, LLC	justgoodbye@donuts.co
165	1-1525-41533	Pine Moon, LLC	pinemoon@donuts.co
166	1-1523-55821	Corn Dynamite, LLC	cordynamite@donuts.co
167	1-1531-96078	Atomic Station, LLC	atomicstation@donuts.co
168	1-1540-49920	Victor Trail, LLC	victortrail@donuts.co
169	1-1536-79233	Blue Falls, LLC	bluefalls@donuts.co
170	1-1535-64595	Trixy Oaks, LLC	trixyoaks@donuts.co
171	1-1539-6233	John McCook, LLC	johnmccook@donuts.co
172	1-1542-96415	Big Fest, LLC	bigfest@donuts.co
173	1-1543-47454	Hidden Frostbite, LLC	hiddenfrostbite@donuts.co
174	1-1545-55209	Half Woods, LLC	halfwoods@donuts.co

175	1-1547-37710	Outer Way, LLC	outerway@donuts.co
176	1-1546-93002	Foggy North, LLC	foggynorth@donuts.co
177	1-1544-18264	June Woods, LLC	junewoods@donuts.co
178	1-1549-37731	Hidden Cypress, LLC	hiddencypress@donuts.co
179	1-1550-65638	Over Corner, LLC	overcorner@donuts.co
180	1-1551-91953	Dash Tigers, LLC	dashtigers@donuts.co
181	1-1548-63140	Victor Dale, LLC	victordale@donuts.co
182	1-1552-8006	Victor Frostbite, LLC	victorfrostbite@donuts.co
183	1-1555-40996	John Goodbye, LLC	johngoodbye@donuts.co
184	1-1553-52336	Victor Way, LLC	victorway@donuts.co
185	1-1557-30317	Fern Pass, LLC	fernpass@donuts.co
186	1-1556-47497	Lone Hollow, LLC	lonehollow@donuts.co
187	1-1560-69674	Grand Glen, LLC	grandglen@donuts.co
188	1-1561-23663	Steel Hill, LLC	steelhill@donuts.co
189	1-1563-40885	Dog Beach, LLC	dogbeach@donuts.co
190	1-1566-85057	Pixie North, LLC	pixienorth@donuts.co
191	1-1567-79679	Outer McCook, LLC	outermccook@donuts.co
192	1-1564-75367	Outer Gardens, LLC	outergardens@donuts.co
193	1-1570-42842	New Frostbite, LLC	newfrostbite@donuts.co
194	1-1571-12951	Victor Cross, LLC	victorcross@donuts.co
195	1-1572-10553	Trixy Manor, LLC	trixymanor@donuts.co
196	1-1573-27315	Hidden Bloom, LLC	hiddenbloom@donuts.co
197	1-1575-53902	Grand Turn, LLC	grandturn@donuts.co
198	1-1574-83272	Bitter Frostbite, LLC	bitterfrostbite@donuts.co
199	1-1579-33517	Silver Tigers, LLC	silvertigers@donuts.co
200	1-1576-29395	Magic Glen, LLC	magicglen@donuts.co
201	1-1577-85976	Sea Goodbye, LLC	seagoodbye@donuts.co
202	1-1578-44109	John Island, LLC	johnisland@donuts.co
203	1-1582-80831	Wild Frostbite, LLC	wildfrostbite@donuts.co
204	1-1581-70192	Sugar Glen, LLC	sugarglen@donuts.co
205	1-1580-67148	Sea Corner, LLC	seacorner@donuts.co
206	1-1585-29698	Foggy Sky, LLC	foggysky@donuts.co
207	1-1583-6697	Foggy Moon, LLC	foggymoon@donuts.co
208	1-1584-14507	Snow Galley, LLC	snowgalley@donuts.co
209	1-1586-62771	Spring Tigers, LLC	springtigers@donuts.co
210	1-1589-56456	Sugar Mill, LLC	sugarmill@donuts.co

211	1-1587-4615	Binky Mill, LLC	binkymill@donuts.co
212	1-1590-83448	Magic Birch, LLC	magicbirch@donuts.co
213	1-1588-73251	Big Pass, LLC	bigpass@donuts.co
214	1-1588-73251	Steel Goodbye, LLC	steelgoodbye@donuts.co
215	1-1594-21696	Black Orchard, LLC	blackorchard@donuts.co
216	1-1593-8224	Tin Dale, LLC	tindale@donuts.co
217	1-1597-13898	New North, LLC	newnorth@donuts.co
218	1-1598-77594	Dash Bloom, LLC	dashbloom@donuts.co
219	1-1603-97736	Grand Island, LLC	grandisland@donuts.co
220	1-1595-97277	Steel Keep, LLC	steelkeep@donuts.co
221	1-1606-68851	New Cypress, LLC	newcypress@donuts.co
222	1-1604-36499	Pearl Town, LLC	pearltown@donuts.co
223	1-1600-90191	Big Hollow, LLC	bighollow@donuts.co
224	1-1611-39225	Lone Sunset, LLC	lonesunset@donuts.co
225	1-1615-74729	Binky Glen, LLC	binkyglen@donuts.co
226	1-1610-3807	Snow Avenue, LLC	snowavenue@donuts.co
227	1-1607-34771	Extra Cover, LLC	extracover@donuts.co
228	1-1131-85666	Ruby Moon, LLC	rubymoon@donuts.co
229	1-1612-2805	Atomic Cross, LLC	atomiccross@donuts.co
230	1-1616-69474	Snow Park, LLC	snowpark@donuts.co
231	1-1617-57149	Half Bloom, LLC	halfbloom@donuts.co
232	1-1618-18834	Outer Orchard, LLC	outerorchard@donuts.co
233	1-1624-75239	Delta Orchard, LLC	deltaorchard@donuts.co
234	1-1622-67844	Little Galley, LLC	littlegalley@donuts.co
235	1-1627-1624	Outer Moon, LLC	outermoon@donuts.co
236	1-1626-61742	Bitter McCook, LLC	bittermccook@donuts.co
237	1-1625-43519	Fern Trail, LLC	fertrail@donuts.co
238	1-1628-41321	Fox Castle, LLC	foxcastle@donuts.co
239	1-1630-4186	Binky Galley, LLC	binkygalley@donuts.co
240	1-1632-57390	Sugar Maple, LLC	sugarmaple@donuts.co
241	1-1631-16988	Sea Tigers, LLC	seatigers@donuts.co
242	1-1633-36635	Snow Beach, LLC	snowbeach@donuts.co
243	1-1634-15520	Fern Madison, LLC	fernmadison@donuts.co
244	1-1637-12997	Corn Mill, LLC	cornmill@donuts.co
245	1-1636-27531	Wild Lake, LLC	wildlake@donuts.co
246	1-1635-18982	Foggy Shadow, LLC	foggyshadow@donuts.co

247	1-1621-97265	Over Birch, LLC	overbirch@donuts.co
248	1-1623-664	Ruby Town, LLC	rubytown@donuts.co
249	1-1620-15722	Silver Cover, LLC	silvercover@donuts.co
250	1-1619-92115	Foggy Sunset, LLC	foggysunset@donuts.co
251	1-1614-27785	Steel Edge, LLC	steedge@donuts.co
252	1-1613-64465	Extra Beach, LLC	extrabeach@donuts.co
253	1-1609-60839	Sand Dale, LLC	sanddale@donuts.co
254	1-1608-9291	Spring Goodbye, LLC	springgoodbye@donuts.co
255	1-1605-75916	Romeo Birch, LLC	romeobirch@donuts.co
256	1-1602-30813	Binky Moon, LLC	binkymoon@donuts.co
257	1-1596-35125	Dog Bloom, LLC	dogbloom@donuts.co
258	1-1601-42282	Atomic Fields, LLC	atomicfields@donuts.co
259	1-1591-23028	Half Falls, LLC	halffalls@donuts.co
260	1-1568-22230	Grand Orchard, LLC	grandorchard@donuts.co
261	1-1569-96051	Tin Avenue, LLC	tinavenue@donuts.co
262	1-1565-27165	Dash Cypress, LLC	dashcypress@donuts.co
263	1-1562-9879	Storm Orchard, LLC	stormorchard@donuts.co
264	1-1558-74769	Pine Falls, LLC	pinefalls@donuts.co
265	1-1559-19356	Atomic Lake, LLC	atomiclake@donuts.co
266	1-1554-19894	Lone Moon, LLC	lonemoon@donuts.co
267	1-1639-5968	Auburn Falls, LLC	auburnfalls@donuts.co
268	1-1640-29241	Cotton Bloom, LLC	cottonbloom@donuts.co
269	1-1641-67063	Blue Tigers, LLC	bluetigers@donuts.co
270	1-1638-77826	Atomic McCook, LLC	atomicmccook@donuts.co
271	1-1646-17411	Victor Manor, LLC	victormanor@donuts.co
272	1-1644-52968	Corn Willow, LLC	cornwillow@donuts.co
273	1-1645-45928	Dog Edge, LLC	dogedge@donuts.co
274	1-1643-67659	Pearl Woods, LLC	pearlwoods@donuts.co
275	1-1653-6258	Pioneer North, LLC	pioneernorth@donuts.co
276	1-1648-61876	Sugar Station, LLC	sugarstation@donuts.co
277	1-1655-79604	Koko Moon, LLC	kokomoon@donuts.co
278	1-1650-66027	Pioneer Orchard, LLC	pioneerorchard@donuts.co
279	1-1654-94203	Little Manor, LLC	littlemanor@donuts.co
280	1-1652-41660	Wild Willow, LLC	wildwillow@donuts.co
281	1-1656-46642	Boss Castle, LLC	bosscastle@donuts.co
282	1-1651-77163	Little Station, LLC	littlestation@donuts.co

283	1-1647-84596	Atomic Tigers, LLC	atomictigers@donuts.co
284	1-1649-44756	Binky Lake, LLC	binkylake@donuts.co
285	1-1642-14231	Wild Dale, LLC	wilddale@donuts.co
286	1-1629-12298	Black Madison, LLC	blackmadison@donuts.co
287	1-1480-90854	Lone Tigers, LLC	lonetigers@donuts.co
288	1-1537-30547	New Sky, LLC	newsky@donuts.co
289	1-1538-23177	Holly Shadow, LLC	hollyshadow@donuts.co
290	1-1532-71538	John Corner, LLC	johncorner@donuts.co
291	1-1533-53706	Koko Station, LLC	kokostation@donuts.co
292	1-1530-99208	Double Falls, LLC	doublefalls@donuts.co
293	1-1529-46197	Ruby House, LLC	rubyhouse@donuts.co
294	1-1528-66412	Sand Shadow, LLC	sandshadow@donuts.co
295	1-1527-54849	Ruby Glen, LLC	rbyglen@donuts.co
296	1-1524-44846	Fern Edge, LLC	fernedge@donuts.co
297	1-1519-43980	Wild Madison, LLC	wildmadison@donuts.co
298	1-1515-14214	June Station, LLC	junestation@donuts.co
299	1-1518-50195	Little Dynamite, LLC	littledynamite@donuts.co
300	1-1504-13424	Bitter Fields, LLC	bitterfields@donuts.co
301	1-1508-57100	Hidden Way, LLC	hiddenway@donuts.co
302	1-1502-54392	Victor Falls, LLC	victorfalls@donuts.co
303	1-1503-89379	Outer Falls, LLC	outerfalls@donuts.co
304	1-1495-41000	Dash McCook, LLC	dashmccook@donuts.co
305	1-1490-59840	Wild Island, LLC	wildisland@donuts.co
306	1-1491-83816	Will Bloom, LLC	willbloom@donuts.co
307	1-1485-72605	Spring Fields, LLC	springfields@donuts.co