GAC Advice Response Form for Applicants

The Governmental Advisory Committee (GAC) has issued advice to the ICANN Board of Directors regarding New gTLD applications. Please see Section IV, Annex I, and Annex II of the GAC Beijing Communique 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 GAC Advice" (for example "1-111-11111 Response to GAC Advice"). All GAC Advice Responses must be received no later than 23:59:59 UTC on 10-May-2013.

Respondent:

Applicant Name	Artemis Internet Inc.
Application ID	1-1796-18939
Applied for TLD (string)	secure

Response:
May 2, 2013

Re: Section IV.1.b and Annex 1 of the GAC Communique, dated 11 April 2013 ("GAC Safeguards")

Dear members of the ICANN Board,

Artemis Internet Inc., applicant for .secure ("Artemis"), thanks the Board for the opportunity to comment.

Artemis applauds the GAC's sentiment to promote security and consumer protection with the new gTLD program. We write to request that the Board add .secure to the non-exhaustive list of strings, under Category 1, that should apply the GAC Safeguards.

We would be delighted to be bound by these safeguards. Their purpose aligns with our mission to create the Internet's "safest neighborhood"—a namespace that:

 - equitably limits registration to verified identities that are legitimate operators of their domains,
 - continuously monitors for compliance with best-in-class security policies, and
 - rigorously enforces compliance via control of registrants' DNS.

Because it is in our business interest to meet or surpass the GAC Safeguards:

1. Artemis is ready to conduct checks of WHOIS accuracy. We will do so for each and every registrant, not merely for a "statistically significant" number of registrants. Additionally, beyond identity, we will check registrants for applicable trademark rights and regulatory approval (i.e.,

the right to operate domain names that consumers would link to particular industries, like the financial industry). Our registration process would be time/human intensive. We believe this investment is necessary to reduce the risk that consumers connect with bad hosts in our namespace – a risk that ultimately hurts our brand and that of our good registrants.

2. Artemis is ready to prohibit bad conduct within registrants' terms of use. We are working with security leaders from leading cross-sector companies (that potentially will register for a .secure domain) to devise an ambitious, but practical, security bar that all registrants would be required clear in order to register in and maintain presence on our namespace. The security policies that result from this consensus-driven process will be regularly refreshed to reflect improvements to security protocols. Our terms of use will require registrants to comply with the current and all future refreshes of the .secure security policies. In addition to security compliance, our terms of use will require registrants to adhere to a code of conduct requiring compliance with applicable laws, including those related to fraud and trademark or copyright infringement.

3. Artemis is ready to conduct technical analysis for security threats, while respecting registrants' privacy and confidentiality. Registrants in our namespace would need to either designate Artemis as the authoritative source for DNS resolution or allow for full zone transfers. This gives us full visibility and technical control, from root to leaf, of domains in our namespace. Having this visibility and control enables us to identify each of the actors in the .secure namespace, the first step in monitoring .secure for bad actors and security threats. We will monitor (manually and automatically) on a recurring basis for such bad actors and security threats, which are violations of our security policies, developed and/or approved in conjunction with .secure registrants.

4. Artemis is ready to maintain statistical reports for bad actors, including those who give inaccurate WHOIS records or fail to comply with our security policies. We will use the .secure TLD to effect our policy- and technology-driven compliance platform. A key component of this platform is recurring monitoring and documentation of the results of such monitoring for compliance with our policies. We would be able to easily provide statistical reports based off of these records to ICANN upon appropriate request.

5. Artemis is ready to devise and improve processes for people to complain to Artemis about bad actors, including those who give inaccurate WHOIS records or fail to comply with our security policies. Enforcement of good behavior is crucial to our business' success. We will have automatic and human cops "on beat" within our "safe neighborhood" to enforce the .secure security policies and code of conduct. Additionally, we would appreciate "vigilant neighbors" keeping watch and will make it easy for them to report findings of bad conduct. We're aiming for an unprecedented level of commitment to security and protection in our namespace. As such, we will develop incentives for as many people as possible to care about .secure.

6. Artemis is ready to enforce "real and immediate consequences," including suspension of domain names. Using fair and fairly applied policies, we will wield the power to suspend domain names—from the level of a specific sub-domain up to the second-level—to ensure we protect our brand, good registrants and consumers. We will suspend as often and as many registrants as warrant it. But, we anticipate that the need will be infrequent because we will vigorously vet for commitment to security and consumer protection at the registration stage. Passing our verification and security policies is a pre-requisite for appearing on our namespace.

Thank you again for the opportunity to comment. It has been a pleasure to address you. We appreciate you taking time to consider Artemis' perspective.

Sincerely,

Alex Stamos, CTO
Artemis Internet Inc.