

Dear Ms. Radell,

You and the members of the Government Advisory Committee to the Internet Corporation for Assigned Names and Numbers deserve to be applauded for the work you have accomplished in Beijing. It is rare that an organization as diverse as the GAC is able to take swift action in a cooperative manner to produce a formal communiqué to the Board of ICANN in the timeline you have accomplished. It is a shining example of how an engaged community can efficiently achieve results.

While I doubt the action of the GAC will be picked up in the major news cycles, what GAC has accomplished today will have wide-ranging benefits that will stand the test of time. The measures implemented to protect corporate identities and help enhance public trust in the internet space will have greater impact on the average citizen of the world than most will ever realize. This clear instance can be used repeatedly as an example of when the system worked for the community.

When we at Dot Registry made the decision to apply for the corporate gTLDs “.CORP”, “.INC”, “.LLC”, and “.LLP”, it was clear that these gTLDs were more than a commodity, rather they represented a community, and the outcome of their implementation would have ramifications that not only impacted Registrants but consumers as well. To that end, we worked as a team to determine how best to engage the Community of Registered US Businesses and to identify not only how it was delineated, but what the membership regulations consisted of, who administered entrance to this community, and what protections would be necessary to maintain the integrity of the community as a whole. In the United States businesses are registered through their local Secretary of States offices or other applicable entity. Through this knowledge we worked diligently to form relationships with various Secretary of States Offices in order to best perform the due diligence required to responsibly manage these strings.

Through communications with individual Secretaries and The National Association of Secretaries of State we were made aware of the potential for abuse in conjunction with these corporate designations. This concern was compounded by the the lack of oversight in place to monitor non- community applicant's on-going operations, the activities of registry operators, the inability to have recourse against generic applications, and the limited ability to hold a registry operator accountable once strings are awarded. By engaging the Secretaries early, Dot Registry was able to address their concerns from the outset, including proactive verification, extensive protection mechanisms built into our registry policies and a method to create the ongoing oversight required to responsibly manage a community designation. While all of these policies can be seen throughout our applications the value of such items are continuously reinforced in the communication that ICANN has recently received from various Secretary of States Offices indicating their desire to avert the catastrophe that would result from a commoditization of corporate entity designations in the Internet space.

Today, through its action, the GAC has demonstrated how the stakeholder driven process does work and has taken the first step in ensuring that these strings will only be awarded to a party that is able to not only responsibly manage these designations, but also that can demonstrate a clear understanding of the policies and protections necessary for continued success over time.

The mission of the Government Advisory Committee is not one that is easily accomplished. We, the members of the Dot Registry team, would like to thank you for the leadership you have demonstrated throughout this process, for hearing and considering the concerns of this community and for your prompt and thorough attention to this matter. We believe the positive ramifications of this advice will be seen across the business community, throughout the Secretaries of State's offices, and the Internet environment as a whole.

Thank you again for your thoughtful consideration,

Shaul Jolles, DOT Registry, LLC CEO