



Internet Corporation of Assigned Names and Numbers
12025 Waterfront Drive Ste 300
Los Angeles, CA 90094-2536

RE: GAC Communiqué – Singapore Issued March 27, 2014

April 24, 2014

To Whom It May Concern:

As the only community applicant for the extensions of: “INC”, “LLC”, “LLP” and “CORP” we at Dot Registry would like to take this opportunity to commend the GAC for the specific requests delivered through the Singapore communiqué. We are particularly pleased with the re-iteration of recommendations for Category 1 strings, which denotes the insufficient protections created by the non-binding nature of public interest commitments (PICS) and the necessity for pre-verification of registrant data for Category 1 strings.

Over the last two years Dot Registry has worked diligently to create a data pre-verification system for registrants, which will ensure transparency, accuracy in reporting and consumer protection. This process, like many other rights protections mechanisms are detailed in our initial applications. Additionally, through our ongoing communications with the Secretary of State’s offices in the United States we have been able to isolate the key requirements necessary to validate a Registrant’s membership in the Community of Registered US Businesses and to monitor their continued compliance over time. It is background research, relationships with the governing bodies who oversee our community, and secure infrastructure, which sets Dot Registry apart from our competitors.

A strong sense of responsibility should be felt by all registries associated to Category 1 strings. Policies for pre-verification, best practices, and control mechanisms should be firmly in place prior to delegation and not be considered optional. Applicants who are unable to delineate specific policies and mechanisms to adhere to GAC recommendations should not be awarded Category 1 strings and PICS should not be considered sufficient to protect these sensitive extensions. It is also important to note the GAC’s continued support of Community Applications and the sentiment that where applicable mechanisms should be put in place to support community applicants for sensitive extensions. Community applications represent

the strongest form of binding commitment to continued protections over time and are the most closely formatted to meet GAC recommendations.

We encourage ICANN to provide the GAC with specific responses in relation to the concerns listed in the Singapore communiqué and to not minimize the potential damage that could be done to both registrants and end-users should sensitive extensions be awarded to irresponsible parties. The GAC has asked ICANN repeatedly to create sustainable protection mechanisms that are binding for applicants, we at Dot Registry hope the board will respond with concrete, enforceable requirements that mandate preregistration verification that mitigates fraud and consumer harm in these sensitive strings.

Sincerely,



Shaul Jolles
CEO