



September 4, 2013

Ms. Christine Willett
Vice President, New gTLD Program
ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

Dear Christine,

Dot Registry LLC is the only community applicant for the corporate identifier strings .INC, .LLC, .LLP and .CORP. We are submitting this letter to provide feedback in response to the Community Priority Evaluation (CPE) component of the New gTLD Program. We appreciate the opportunity to share our initial comments and concerns about the CPE process and the Guidelines published on August 16, 2013.

We would first like to reaffirm our support for the letter recently submitted by the Community TLD Applicant Group (CTAG). Dot Registry LLC echoes the thoughts and ideas expressed therein, and would like to take this opportunity to reinforce our support of the following points:

With regard to the Guidance on **Criterion #4 Community Endorsement, 4.A Support, Letter(s) of Support and their Verification**, the Evaluation Guidelines state,

“Letter(s) of support must be evaluated to determine both the relevance of the organization and the validity of the documentation and must meet the criteria spelled out below. The letter(s) of support is an input used to determine the relevance of the organization and the validity of the documentation. “

Under **Additional information on the verification of letter(s) of support**, it is further clarified that,

“The contact must send an email acknowledging that the letter is authentic, as a verbal acknowledgement is not sufficient.”

The Letters provided along with our applications are from individual Secretaries of State, on their official State’s letterhead, and from the National Association of Secretaries of State (NASS), as a whole which unanimously passed a resolution expressing their “collective and



clear opinion” that these extensions should be issued as community designations. See [http://nass.org/index.php?option=com_docman&task=doc_download&gid= 1435&Itemid=](http://nass.org/index.php?option=com_docman&task=doc_download&gid=1435&Itemid=) NASS was founded in 1904, and its members include Secretaries of State and Lieutenant Governors from all 50 states and its territories.

For Dot Registry LLC to submit a letter from anyone other than the party whose signature occupies the bottom of any one of our many letters provided would mean that we are actively and intentionally participating in fraudulent activity. This goes against not only Dot Registry LLC’s mission, but the mission of our supporters – the government officials responsible for overseeing the registration of all U.S. business entities. For ICANN to request an email from a Secretary of State, Lieutenant Governor, or other NASS official validating that they are who they say they are would be an embarrassment for ICANN, and potentially an insult to these government officials who support our effort.

If such confirmation of the validity of a letter is necessary, we propose that Dot Registry LLC sign a statement asserting the validity of our Letters indicating that they are true, accurate and reliable. Signing such a statement would make any findings against our declarations punishable by law.

On the subject of letters of objection that may come in last minute, ICANN and the evaluators must take a hard line against any letters “that are clearly spurious, unsubstantiated, made for a purpose incompatible with competition objectives, or filed for the purpose of obstruction.” Strict enforcement of this provision of the Guidebook is critical to the integrity of the Community Priority Evaluation Process.

We also hope that during the upcoming call, we will receive an update on efforts to facilitate interaction between community applicants and the evaluators, as was discussed during our meetings in Durban.

We thank you again for the opportunity to provide feedback as we all seek to move through the Community Evaluation Process in a manner that is most fair and timely.

Sincerely,

A handwritten signature in black ink that reads "S. Jolles".

Shaul Jolles, CEO