

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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Jenny Rubin, et al.)	
)	
Plaintiffs,)	
)	CIVIL ACTION NO. 01-1655-RCL
v.)	
)	
The Islamic Republic of Iran, et al.)	
)	
Defendants.)	
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Susan Weinstein, et al.)	
)	
Plaintiffs,)	
)	CIVIL ACTION NO. 00-2601-RCL
v.)	
)	
The Islamic Republic of Iran, et al.)	
)	
Defendants.)	
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Seth Charles Ben Haim, et al.)	
)	
Plaintiffs,)	
)	CIVIL ACTION NO. 02-1811-RCL
v.)	CIVIL ACTION NO. 08-520-RCL
)	
The Islamic Republic of Iran, et al.)	
)	
Defendants.)	
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Ruth Calderon-Cardona, et al.)
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Plaintiffs,)
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v.)
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Democratic People’s Republic of Korea, et)
al.)
)
Defendants.)
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Mary Nell Wyatt, et al.)
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Plaintiffs,)
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v.)
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Syrian Arab Republic, et al.)
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Defendants.)
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Shaul Stern, et al.)
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Plaintiffs,)
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v.)
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The Islamic Republic of Iran, et al.)
)
Defendants.)
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MISC. NO. 14-648-RCL

CIVIL ACTION NO. 08-502-RCL

CIVIL ACTION NO. 00-2602-RCL

**NONPARTY ICANN’S OPPOSITION TO PLAINTIFFS’
MOTION FOR SIX-MONTH DISCOVERY PERIOD**

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Nonparty Internet Corporation for Assigned Names and Numbers (“ICANN”) hereby opposes Plaintiffs’ Motion For Six-Month Discovery Period (“Motion”) filed in the seven actions captioned above.

INTRODUCTION

With their Motion, Plaintiffs once again seek more time and more discovery. (Dkt. No. 129.)¹ But they have already received generous amounts of both and are entitled to no more. Indeed, implicit in Plaintiffs’ earlier successful request for a six-week extension of time to oppose ICANN’s Motion to Quash Plaintiffs’ Writs of Attachment (“Motion to Quash”) was an assurance to the Court that Plaintiffs would, in fact, stand ready to oppose the Motion to Quash by the extended deadline of September 30, 2014. Plaintiffs failed to deliver on that assurance.

Just three business days before Plaintiffs’ opposition was due, Plaintiffs decided that having nine weeks to oppose ICANN’s Motion to Quash was not enough. Wanting more, Plaintiffs ignored this Court’s order, filed a non-substantive “preliminary response” to ICANN’s Motion to Quash, and sought *another* extension of time to some undefined future date more than six months out. For many reasons, the Court should reject this attempt at needless delay and rule on ICANN’s Motion to Quash.

First, Plaintiffs’ own Motion demonstrates why the requested six-month discovery extension is unwarranted. As a threshold and dispositive matter, Plaintiffs’ discovery requests relate to only a small portion of ICANN’s Motion to Quash and are aimed at demonstrating that a country code top-level domain (“ccTLD”) is “property” that can be transferred by ICANN. But as set forth in ICANN’s Motion to Quash and Reply in support thereof, the pertinent issue is not merely whether a ccTLD is property, but whether a ccTLD is *attachable property* under

¹ For convenience, throughout this memorandum, ICANN cites to filings in the first cited case in the caption.

District of Columbia law. As a matter of law, however, a ccTLD certainly is not attachable property because it is inextricably intertwined with a provision of services. Thus, the discovery Plaintiffs actually seek—all premised on the mistaken notion that services may be attached—will not alter the legal conclusion that such services are not attachable.

Second, because Plaintiffs’ discovery is only aimed at the issues of whether a ccTLD is property that can be transferred by ICANN, Plaintiffs have conceded the other legal issues raised in ICANN’s Motion to Quash. To be clear, in its Motion to Quash, ICANN asserted six independent legal grounds for quashing Plaintiffs’ Writs of Attachment, yet Plaintiffs seek discovery on only two. There can be no reason, and Plaintiffs offer none, for delaying a ruling on the remaining four grounds in support of ICANN’s Motion to Quash.

Third, as if the foregoing was not enough, Plaintiffs’ request for additional discovery and time is a classic fishing expedition. Plaintiffs *speculate* about what they might obtain in discovery and *misrepresent* documents that ICANN has already produced. But far from justifying additional discovery, such speculation and misrepresentation underscore just how unproductive and wasteful Plaintiffs’ requested discovery would be. This is particularly so in light of the ample opportunity Plaintiffs have had to conduct discovery and obtain relevant information, both before and after issuing their Writs of Attachment to ICANN.

Fourth, even if Plaintiffs could overcome all of these deficiencies, Plaintiffs’ discovery requests remain improper. As they have before, Plaintiffs again issue overbroad demands for “all documents” relating to various issues, events, and functions with no time or subject-matter limitations. They also seek ICANN’s private financial and technical documents, as well as depositions of ICANN’s counsel. None of this, however, is discoverable from a nonparty-garnishee to say nothing of the obvious privilege obstacles. More broadly, Plaintiffs’ discovery

requests demand information that is irrelevant and unnecessary in that it has no relation to Defendants or their assets, and thus is not calculated to assist Plaintiffs in collecting on their judgment. Moreover, Plaintiffs' discovery requests seek information that is already available to them in the immeasurable amount of data publicly posted on ICANN's website as part of ICANN's dedication to act in an open and transparent manner.

Accordingly, ICANN respectfully requests that the Court deny Plaintiffs' Motion and proceed to granting ICANN's Motion to Quash. To the extent the Court is not inclined to proceed in this fashion, and Plaintiffs are permitted to seek additional discovery from ICANN and others, ICANN respectfully requests that the Court order Plaintiffs to reimburse ICANN, a nonparty with no interest in Plaintiffs' underlying cause of action against Defendants, for attorneys' fees and other costs associated with that additional discovery.

RELEVANT BACKGROUND

In hopes of collecting on judgments against Iran, Syria, and North Korea (the "Defendants"), Plaintiffs seek to "attach" certain two-letter alphabetic codes, along with related Non-ASCII codes and supporting Internet Protocol ("IP") addresses, that signify services provided to Internet users. Plaintiffs, however, are badly confused about the nature and legal status of the codes and addresses they seek to attach. A brief restatement of the background points from ICANN's Motion to Quash shows as much.

Technological Background. The Internet depends on a stable, secure, and interoperable "world-wide network of networks . . . all sharing a common communications technology." *Perfect 10, Inc. v. Amazon.com, Inc.*, 508 F.3d 1146, 1155 (9th Cir. 2007). The networks comprising the Internet communicate and locate one another through IP addresses, which are numerical sequences separated by periods—*e.g.*, "192.0.34.163." (Dkt. No. 106-2 (Jeffrey Decl.

in Supp. of ICANN’s Mot. to Quash) at ¶ 3.) As with a street address or telephone number, each IP address is a unique, numerical identifier representing a particular source of data on the Internet. (*Id.*) For example, computers attempting to connect with this Court’s website identify the website as “63.124.22.40.”

Asking Internet users to remember each website’s numeric IP address would have been unworkable, and so the Internet community came up with a better system. Instead of a string of numbers, IP addresses are standardized into a memorable set of characters and numbers, all part of what is known as the Domain Name System (“DNS”). The DNS allows users to simply remember a website by its popular title—or “domain name”—rather than the complicated numerical sequences of IP addresses. For example, Internet users locate this Court’s website by typing “DCD.USCOURTS.GOV” into their Internet browsers, rather than trying to remember its IP address, “63.124.22.40.”

Domain names essentially comprise two elements: What comes before and after the last dot. (*Id.* at ¶ 4.) Characters after the dot, such as “.COM,” “.GOV” or “.US,” are known as the top-level domain (“TLD”). TLDs generally can be categorized two ways—as a generic TLD (“gTLD”), such as .COM or .GOV, or country-code TLDs (“ccTLDs”), such as .US and .UK. (*Id.*) A ccTLD is essentially a TLD with some geographical significance. .US, for example, is used to depict domain names generally relevant to the United States, .UK for the United Kingdom, and so forth. The part of a domain name before the last dot, such as “USCOURTS” in USCOURTS.GOV or “ICANN” in ICANN.ORG, is referred to as a second-level domain name. Those second-level domain names are what individuals and entities can register in the gTLDs and ccTLDs, which are then used to identify online websites and email addresses. (*Id.*) In essence, a gTLD or ccTLD is a database that operates as a phone book containing the links

between unique IP addresses and the unique second-level domain names that are registered within that gTLD or ccTLD.

ICANN's Unique Role In The Internet Community. ICANN is a public-benefit nonprofit corporation that was established in 1998 to provide technical coordination for the DNS. ICANN was created as part of a federal initiative to privatize the Internet so that no one group or one government would have a right to, or responsibility over, the DNS, and management of the DNS would reside with those who actually use the Internet. (*Id.* at ¶ 5.) From its inception, ICANN's mission has been to protect the stability, integrity, interoperability, and utility of the DNS on behalf of the global Internet community. (Dkt. No. 106-3 (Enson Decl. in Supp. of ICANN's Mot. to Quash) at ¶ 2, Ex. A at Art. I, § 1 (ICANN's Bylaws).) As part of ICANN's commitment to operating in an open and transparent manner, ICANN publicly posts on its website documents and information regarding ICANN's operational activities, policies and developments. (Decl. of Eric P. Enson filed concurrently herewith ("Enson Decl. III"), ¶¶ 2–3, Ex. A.) This comprehensive set of publicly-available materials contains much of the information Plaintiffs seek with their Motion. (*Id.*)

The IANA Functions. One way in which ICANN fulfills its mission is by performing what are known as the Internet Assigned Numbers Authority ("IANA") functions. Since 2000, ICANN has performed the IANA functions pursuant to the "IANA Functions Contract" with the United States Department of Commerce. (Dkt. No. 106-3, ¶ 3, Ex. B (IANA Functions Contract).) The most-recent IANA Functions Contract was entered into in 2012, and remains in effect today. (*Id.*)

As part of the IANA Functions Contract, ICANN maintains the technical and administrative details of the DNS's "Root Zone Database." The Root Zone Database is used to

compile the Root Zone of the Internet—an authoritative list of all network locations for the over 650 TLDs in operation today. (Dkt. No. 106-2 at ¶ 9.) The Root Zone enables computers and other devices to locate websites via their domain names, by referring those devices to a list of servers that host the corresponding TLDs. (*Id.*) As a result, TLDs must be “delegated,” or connected, to the Root Zone Database in order for Internet users to access the websites registered under them.

ICANN’s authority over the Root Zone Database is limited. While ICANN may recommend changes to the Root Zone Database—such as delegating a new TLD or re-delegating an existing TLD to another operator—the IANA Functions Contract prohibits ICANN from unilaterally delegating or re-delegating TLDs. (Dkt. No. 106-3 at ¶ 3, Ex. B at §§ C.2.9.2, C.2.9.2.a, C.2.9.2.c., C.8.1, C.8.2, C.8.3.) Rather, under the IANA Functions Contract, the U.S. Government oversees and must approve changes to the Root Zone Database. (*Id.*)

gTLD Operators and ccTLD Managers. ICANN’s administrative responsibilities also involve gTLDs and ccTLDs. For instance, ICANN is responsible for vetting the entities that operate gTLDs and ccTLDs. (Dkt. No. 106-2 at ¶ 7.) Typically referred to as “Registry Operators” in relation to gTLDs, these entities manage the list of second-level domains (the part before the last dot) registered within any of their given gTLDs, such as .COM or .ORG. (*Id.*) To ensure that these gTLDs remain stable and interoperable, ICANN and the gTLD Registry Operators enter into comprehensive contracts that specify the parties’ obligations and establish continuing channels of communication between them. (*Id.* at ¶ 10.)

ICANN’s relationship with the operators of ccTLDs, usually referred to as “ccTLD managers,” however, is different. As with gTLD operators, ICANN does vet and make recommendations to the U.S. Government regarding ccTLD managers. But unlike gTLD

operators, ccTLD managers administer ccTLDs to serve the global and local Internet communities. (Dkt. No. 106-3 at ¶ 4, Ex. C at ¶ 2.) Although some ccTLD managers voluntarily help to defray ICANN's operating costs through nominal donations, ICANN typically has little or no relationship with ccTLD managers. More often than not, ICANN has only an exchange of letters or a memorandum of understanding with ccTLD managers, if anything, which documents the managers' technical responsibilities and duties. (Dkt. No. 106-2 at ¶ 13.)

At issue in this matter are the .IR, .SY, and .KP ccTLDs, related non-ASCII ccTLDs, and the supporting IP addresses (collectively, the “.IR, .SY, and .KP ccTLDs”). With respect to these ccTLDs, ICANN does not have any form of agreement. Nor does ICANN receive any funding from the entities that operate the .IR, .SY, and .KP ccTLDs, voluntary or otherwise. Indeed, throughout its existence, ICANN has never had any more than minimal, technical interaction with managers of the .IR, .SY, and .KP ccTLDs, and never beyond the scope authorized by the federal government. (*Id.* at ¶¶ 13, 15–16.) Instead, ICANN's role with respect to these ccTLDs, beyond vetting the ccTLD managers and making recommendations to the U.S. Government, is to assist the U.S. Government in facilitating access by ccTLD managers to the Root Zone Database, which, in turn, is what allows ccTLD managers to administer ccTLDs on behalf of the global and local Internet communities.

Legal Background and Procedural History. On June 24, 2014, Plaintiffs issued to ICANN seven writs of attachment seeking to attach the .IR, .SY, and .KP ccTLDs. (*See* Dkt. No. 117-1 (Enson Decl. in Supp. of ICANN's Opp'n to Pls.' Mot. to Compel) at ¶ 2.) According to Plaintiffs, the .IR, .SY, and .KP ccTLDs represent “property” and “assets” of Defendants Iran, Syria, and North Korea, respectively. Plaintiffs further allege that ICANN possesses these ccTLDs, and that ICANN can unilaterally transfer them to Plaintiffs if so ordered.

ICANN has refuted Plaintiffs' claims from the beginning. (*See generally id.*) In its responsive objections and answers to Plaintiffs' Writs of Attachment, ICANN certified, under oath, that it does not hold any "goods, chattels, or credits" of the Defendants. (*Id.* at ¶ 4.) ICANN also certified that it is not "indebted to the Defendants in any way." (*Id.* at ¶¶ 4–5.) ICANN further informed Plaintiffs via phone and email that it possesses no property, money, or credits of the Defendants, and that ICANN has no contracts or agreements with the entities that manage the .IR, .SY, and .KP ccTLDs. (*Id.* at ¶ 7.)

ICANN's Motion to Quash expanded on these points, providing six separate and independently dispositive reasons why Plaintiffs' Writs of Attachment are legally invalid. (Dkt. No. 106-1 (Mem. in Supp. of ICANN's Mot. to Quash).) **First**, the ccTLDs are not "property" subject to attachment, because ccTLDs are short codes representing a collection of technical and administrative Internet services. They are, in other words, in the nature of service contracts, which cannot be attached under District of Columbia law. (*Id.* at 10–13.) **Second**, ccTLDs are not "owned" by the countries they are meant to represent, but rather are "operated in trust in the public interest" with no corresponding legal entitlements. (*Id.* at 13–16.) **Third**, the .IR, .SY, and .KP ccTLDs are not located within the District of Columbia, and thus fall outside the Court's attachment jurisdiction. (*Id.* at 16–17.) **Fourth**, even if these ccTLDs were property belonging to Defendants, the Foreign Sovereign Immunities Act ("FSIA"), 28 U.S.C. §§ 1603, *et seq.*, divests this Court of jurisdiction, because Section 1609 of the FSIA bars attachment of foreign-government assets located in the United States. (*Id.* at 17–18.) **Fifth**, ICANN lacks the authority to re-delegate or transfer ccTLDs unilaterally. ICANN instead tenders the results of its vetting process to the Department of Commerce, which in turn authorizes any such delegation or re-delegation. Accordingly, it is only the U.S. Government that has authority to delegate or transfer

the management of a ccTLD to a new ccTLD manager. (*Id.* at 18–20.) *Sixth*, a court order forcing re-delegation of these ccTLDs would not only destroy their value, and the value of second-level domains registered under them, but it would also jeopardize the stable operation of the Internet. (*Id.* at 20–22.)

Approximately two weeks after ICANN filed its Motion to Quash, Plaintiffs sought and obtained a six-week extension of time to respond, making their opposition due on September 30, 2014. (Dkt. No. 110 (Pls.’ Mot. for Enlargement of Time to Respond to Mot. to Quash).) Rather than meet this generous, Court-ordered extended deadline, Plaintiffs filed the instant Motion seeking more than six additional months to respond to ICANN’s Motion to Quash along with “robust discovery.” (Dkt. No. 129 (Pls.’ Mot. for Disc.)) Then, on September 30, Plaintiffs filed a two-page “preliminary response” to ICANN’s Motion to Quash (“Opposition”) reasserting and attaching this Motion and devoting footnote space to responding to ICANN’s arguments that ccTLDs are not attachable property. (Dkt. No. 130 (Pls. Opp’n to ICANN’s Mot. to Quash).)

Discovery Background. In addition to the interrogatories contained in Plaintiffs’ Writs of Attachment, Plaintiffs also sought and received numerous documents from ICANN. Specifically, Plaintiffs issued to ICANN seven subpoenas *duces tecum*, seeking documents related to the .IR, .SY, and .KP ccTLDs as well as other information regarding payments to or from the Defendants and the .IR, .SY, and .KP ccTLD managers. While preserving its objections thereto, ICANN responded to Plaintiffs’ subpoenas, providing 1,660 pages of documents and identifying scores of publicly available documents relevant to the issues set forth in ICANN’s Motion to Quash. (*See, e.g.*, Dkt. No. 115-2 (Enson Decl. in Supp. of ICANN’s Opp’n to Pls.’ Mot. for Extension of Time to File Response to Mot. to Quash) at ¶ 3, Ex. A.)

Plaintiffs now contend that ICANN’s production of documents was both “tardy” and “limited.” (Dkt. No. 129 at 5.) According to Plaintiffs, ICANN’s Motion to Quash raised a host of new, fact-intensive issues for which they need additional time and discovery. Notably, however, Plaintiffs’ discovery requests are expressly limited to what Plaintiffs’ describe as ICANN’s “two main assertions” in its Motion to Quash—(1) “that the [ccTLDs] are not property,” and (2) “if the [ccTLDs] are property, that ICANN lacks the ability to transfer [them] to Plaintiffs.” (*Id.* at 10.) Plaintiffs claim that without additional discovery on those issues they will be unable “to oppose ICANN’s motion” and this Court will be unable “to make a fully informed decision” as to whether “judgment creditors may seize” ccTLDs. (*Id.* at 4.)

As ICANN explains in this Brief, Plaintiffs are mistaken in all respects.

ARGUMENT

I. A SIX-MONTH DISCOVERY EXTENSION IS NOT JUSTIFIED.

Plaintiffs have provided no legitimate justification for a six-month extension of discovery in this case. Additional discovery is warranted only when necessary to further a party’s claims. *See AF Holdings, LLC v. Does 1-1058*, 752 F.3d 990, 997 (D.C. Cir. 2014). To justify additional discovery, litigants must provide “specific reasons demonstrating the necessity and utility of [such] discovery.” *Strang v. U.S. Arms Control & Disarmament Agency*, 864 F.2d 859, 861 (D.C. Cir. 1989). Because courts are “loathe to credit a party’s mere hunch about the existence of additional documents,” *Huthnance v. Dist. of Columbia*, 255 F.R.D. 285, 289 (D.D.C. 2008), “bare assertions of need” for discovery “will not suffice.” *Berkeley v. Home Ins. Co.*, 68 F.3d 1409, 1415 (D.C. Cir. 1995). Plaintiffs must instead show that the information they seek will likely produce “evidence that would affect the [court’s] legal conclusions.” *Nelson v. Diversified Collection Servs. Inc.*, 961 F. Supp. 863, 873 (D. Md. 1997). Plaintiffs do not satisfy these

requirements, nor do they even attempt to do so.

A. The Discovery Plaintiffs Seek Will Not Alter The Legal Conclusion That ccTLDs Are Not Attachable Property.

Again, Plaintiffs' discovery requests are expressly limited to establishing that ccTLDs are "property" that can be transferred by ICANN. (Dkt. No. 129 at 11, 17.) However, as set forth in ICANN's Motion to Quash and its Reply in support thereof, the pertinent question is not whether a ccTLD is merely property, but whether a ccTLD is *attachable property*. (Dkt. Nos. 106-1 at 10–13; 131 at 6–11.) Under District of Columbia law, rights, interests, or contracts that are intertwined with a provision of services are not subject to attachment. (*Id.*) Thus, the answer to the legal question raised by ICANN is clear and well supported—the .IR, .SY, and .KP ccTLDs cannot be attached under District of Columbia law because "a ccTLD is simply the provision of routing and administrative services for the domain names registered within that ccTLD," they are not attachable property. (Dkt. Nos. 106-1 at 12; 131 at 6–7.) Accordingly, the discovery Plaintiffs seek regarding the .IR, .SY, and .KP ccTLDs will not alter the conclusion that these ccTLDs are not subject to attachment under District of Columbia law. (*Id.*)

B. Plaintiffs Seek Discovery On Only Two Of The Six Legal Bases For Quashing The Writs Of Attachment Thereby Conceding These Issues.

Neither Plaintiffs' Opposition nor their discovery demands address or seek discovery regarding four of the six independent arguments raised in ICANN's Motion to Quash. Plaintiffs' failure to oppose, or seek discovery regarding, ICANN's independently dispositive arguments for quashing the Writs of Attachment necessarily concedes that these issues are ripe for this Court's decision and that additional discovery will not produce "evidence that would affect the [court's] legal conclusions" as to these four arguments. *Nelson*, 961 F. Supp. at 873.

Discovery of the type Plaintiffs seek—which is intended to demonstrate that ccTLDs are "property" and that ICANN unilaterally can transfer them—will not alter the Court's analysis of

the remaining four legal issues raised in ICANN’s Motion to Quash: (1) Whether the FSIA bars attachment of the .IR, .SY, and .KP ccTLDs, even if they can be viewed as Defendants’ property; (2) Whether the .IR, .SY, and .KP ccTLDs are located within this Court’s geographic jurisdiction in the District of Columbia; (3) Whether forcing ICANN to transfer the .IR, .SY, and .KP ccTLDs to Plaintiffs would destroy their value, and the value of thousands of related websites, as well as undermine ICANN’s foundational mission of stabilizing the Internet; and (4) Whether the .IR, .SY, and .KP ccTLDs are “owned” by Defendants.²

More specifically: Plaintiffs’ requested discovery has no bearing on the jurisdictional issues presented by the FSIA. That is, even assuming *arguendo* that the .IR, .SY, and .KP ccTLDs can be considered property belonging to Defendants, no evidence can change the undisputed legal reality that the FSIA divests this Court of subject matter jurisdiction over this attachment proceeding. As ICANN has explained in its Motion to Quash, Section 1609 of the FSIA renders all “property . . . of a foreign state” that is located in the United States “immune from attachment arrest and execution,” unless one of the FSIA’s narrow, enumerated exceptions applies. Accordingly, by requesting no discovery on this threshold matter and failing to oppose ICANN’s Motion to Quash on this point, Plaintiffs admit that the FSIA’s jurisdictional issues may “be addressed by the Court properly” at this stage. (Dkt. No. 129 at 8.) Hence, this Court need not grant Plaintiffs a six-month discovery extension—as no evidence in the world will

²Although Plaintiffs have subsequently tried to expand the scope of their discovery requests, (*see* Dkt. No. 130), even their improper, post-hoc revisions leave at least *two* separately dispositive—and evidentially complete—grounds for quashing Plaintiffs’ writs, (*see* Dkt. No. 131). Indeed, Plaintiffs offer no response in any of their filings to either the jurisdictional limitations of the FSIA, or the consequences of forcing ICANN to transfer the ccTLDs in question. Plaintiffs not only concede, therefore, that this Court need nothing further to rule on those points, but they also concede that ICANN is correct on the merits of those issues, either of which supports the quashing of Plaintiffs’ writs. *See, e.g.*, D.C. Dist. Ct. Local R. 7(b); *see also Hopkins v. Women’s Div., Gen. Bd. of Global Ministries*, 238 F. Supp. 2d 174, 178 (D.D.C. 2002) (“It is well understood in this Circuit that when a [non-movant] files an opposition to a motion . . . addressing only certain arguments raised by the [movant], a court may treat those arguments that the [non-movant] failed to address as conceded.” (citing DC Circuit cases)).

change the language of the FSIA. *See, e.g., Stone v. INS*, 514 U.S. 386, 405 (1995) (cautioning that “jurisdictional statute[s] . . . must be construed with strict fidelity to their terms” (internal quotation marks omitted)).

Likewise, Plaintiffs failed to oppose or seek discovery regarding ICANN’s argument that the .IR, .SY, and .KP ccTLDs are located outside the District of Columbia, and are thus not within this Court’s jurisdiction. (*See* Dkt. No. 106-1 at 23–24.) Here too, then, Plaintiffs concede this argument and it is ripe for decision. The same goes for ICANN’s assertions that a forced transfer of the .IR, .SY, and .KP ccTLDs would destroy not only their value but also the value of the hundreds of thousands of websites registered under them and that the ccTLDs are not owned by Defendants. (*See id.* at 27–29.) Plaintiffs have not opposed these points and seek no discovery regarding them.

Put simply, Plaintiffs’ discovery request is an attempt to delay the inevitable grant of ICANN’s Motion to Quash. This Court has all the information it needs to address at least four dispositive *and unopposed* legal grounds supporting ICANN’s Motion to Quash. Plaintiffs fail to clear the basic threshold requirement that their discovery request be calculated to yield useful information.³

C. Plaintiffs Have Not Shown That Additional Discovery Will Be Fruitful.

Plaintiffs also fail to justify their requested discovery, and incorrectly interpret the documents they offer as showing the opposite of what they actually show. Plaintiffs claim that their supposedly “Impeaching Documents”—a 2008 letter from the Department of Commerce’s

³ Plaintiffs’ analogy to Rule 56 is also flawed. Because ICANN’s challenges pertain to the legal implausibility of Plaintiffs’ allegations, ICANN’s Motion to Quash is functionally identical to a Rule 12(b)(6) motion to dismiss—not a Rule 56 motion for summary judgment. In other words, there is nothing “premature” about quashing Plaintiffs’ Writs of Attachment at this stage, as their pleadings are facially deficient. No amount of evidence will change the basic truth that Plaintiffs seek a remedy that the law does not permit.

National Telecommunications and Information Administration (“NTIA”), and minutes from a 2007 meeting of ICANN’s Board of Directors—justify further discovery by “discredit[ing] ICANN’s position that ccTLDs are not government assets and that ICANN i[s] unable to . . . effect a transfer of a ccTLD.” (Dkt. No. 129 at 10.) Plaintiffs’ reliance on these documents is misplaced, and they do not justify additional discovery.

First, contrary to Plaintiffs’ assertions, NTIA’s 2008 letter does not show that ccTLDs are attachable property. The NTIA letter explains that the United States Government has authority to re-delegate, or return “to unassigned status,” those ccTLDs that are associated with its territories and which have been operated by its agents “on behalf of the United States.” (Dkt. No. 129-2 (Geblin Decl. in Supp. of Pls.’ Mot. for Disc.) at 73–74 (Ex. E).) Although the letter refers to one ccTLD as an “asset,” it does so only in response to a private individual’s claim of control over the ccTLD. (*Id.*) The letter explains that, because the private claimant had not provided “evidence to substantiate” his assertions, his interest in the particular ccTLD was comparatively inferior to that of the United States. (*Id.*)

Accordingly, the 2008 letter is consistent with ICANN’s position that ccTLDs are not attachable property belonging to Defendants. In fact, nowhere does the 2008 NTIA letter analyze the only question relevant here: Whether a ccTLD represents attachable property. As ICANN explained in its Motion to Quash, whether a ccTLD can be considered an “asset” is irrelevant. Just like gTLDs, such as .COM or .EDU, ccTLDs are effectively service contracts. Even though gTLDs, and perhaps ccTLDs, may be valuable in the abstract, that does not change the “clear, unambiguous and well settled” legal rule that such “contracts for services” are “not subject to garnishment” in this jurisdiction, and therefore cannot constitute attachable property. *See, e.g., Sperry v. Am. Politics, Inc.*, Case No. 87-2840, 1988 WL 129733, at *2 (D.D.C. Nov.

17, 1988) (citing *Shpritz v. Dist. of Columbia*, 393 A.2d 68, 70 (D.C. 1978)). If the rule were otherwise, Plaintiffs' theory would permit judgment-creditors to attach a ccTLD or gTLD, including .COM, which may endanger the stability of all second-level domain names registered under it.

The 2008 letter thus reveals a one-time view regarding a narrow subset of ccTLDs in one particular context: A challenge to the federal government's decision to re-delegate one ccTLD. As interesting as that factoid might be, it has nothing to do with the question of whether the .IR, .SY, and .KP ccTLDs are *attachable property*. Contrary to Plaintiffs' assertion, the 2008 letter does not "permit a reasonable deduction that" additional discovery will enable Plaintiffs to prove that issue. *See Hubbard v. Potter*, 247 F.R.D. 27, 29 (D.D.C. 2008). What the letter does permit is a reasonable deduction that Plaintiffs are plainly attempting to attach service contracts, which this Court cannot permit pursuant to District of Columbia law. *See, e.g., Shpritz*, 393 A.2d at 70.

Second, Plaintiffs fare no better in relying on the minutes of an ICANN Board meeting from 2007. Plaintiffs claim that this document shows that "ICANN has taken the position that it alone can act to change the delegation of a ccTLD." (Dkt. No. 129 at 11.) The 2007 Board minutes, however, show no such thing. The minutes show ICANN's Board discussing and deciding to *propose to the U.S. Government* a re-delegation of a ccTLD. (Dkt. No. 129-2 at 81–83 (Ex. F).) These minutes, however, simply do not suggest, as Plaintiffs claim, that the Board's proposal immediately became a final, binding directive. (*Id.*) Rather, these minutes reflect ICANN's previous explanations that, while it may evaluate proposed re-delegations of ccTLDs under appropriate circumstances, the Department of Commerce and its affiliate agencies are ultimately responsible for authorizing such re-delegations (or transfers).

In fact, Plaintiffs’ so-called “Impeaching Documents” ironically impeach Plaintiffs’ own argument that ICANN has unilateral authority to re-delegate the .IR, .SY, and .KP ccTLDs. Notably, NTIA’s 2008 letter explains that “the United States Government must approve any decisions regarding the redelegation of [a] ccTLD.” (Dkt. No. 129-2 at 73–74 (Ex. E).) Moreover, NTIA’s letter indicates that, although the ICANN Board approved the 2007 re-delegation proposal of the .UM ccTLD, that re-delegation did not occur until “NTIA, on behalf of the United States Government, notified ICANN” that the Government “support[ed] the ICANN Board of Directors’ *proposal*.” (*Id.* at 74 (emphasis added).) That is exactly ICANN’s point: It is ultimately the U.S. Government, not ICANN, that has the power to do what Plaintiffs’ Writs of Attachment are seeking.

In sum, Plaintiffs’ supposedly “Impeaching Documents” provide no reason at all to believe that their discovery requests will produce “evidence that would affect the [court’s] legal conclusions.” *Nelson*, 961 F. Supp. at 873. As a result, they are entitled to no further discovery. After all, “the discovery rules are designed to assist a party to prove a claim it reasonably believes to be viable *without discovery*, not to find out if it has any basis for a claim” at all. *Mama Cares Found. v. Nutriset Societe Par Actions Cimpliffee*, 825 F. Supp. 2d 178, 184 (D.D.C. 2011) (emphasis added) (internal quotation marks omitted). Fishing expeditions are not permitted. *See, e.g., Hardrick v. Legal Servs. Corp.*, 96 F.R.D. 617, 618 (D.D.C. 1983).

D. Plaintiffs Have Enjoyed Ample Opportunity For Discovery And Have Repeatedly Delayed These Attachment Proceedings.

Plaintiffs’ request for six additional months of discovery is also unwarranted in light of the discovery opportunities they have already had—both before and after issuance of their Writs of Attachment—and their repeated delay of these attachment proceedings. Parties are not entitled to additional discovery when their failure to secure discoverable evidence is due to a

“lack of diligence.” *Pfeil v. Rogers*, 757 F.2d 850, 857 (7th Cir. 1985). Because of the “delay and expense” inherent in pretrial discovery, *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 35 (1984), the Federal Rules prohibit additional discovery when the requesting party “has had ample opportunity to obtain the information,” Fed. R. Civ. P. 26(b)(2)(C)(ii); *see also Islamic Am. Relief Agency v. Gonzales*, 477 F.3d 728, 737–38 (D.C. Cir. 2007) (holding that additional discovery is not warranted where party “had ample opportunity” to provide evidence supporting its claims).

This is just such a case. As an initial matter, Plaintiffs have held some of their default judgments against Defendants for over a decade, and they have had all that time to investigate the .IR, .SY, and .KP ccTLDs to shore up their claims that they are attachable property owned by Defendants. Instead of taking this approach, Plaintiffs hastily served ICANN with their Writs of Attachment on June 24, 2014. (Dkt. No. 129 at 5.) That same day, Plaintiffs issued to ICANN seven Rule 45 subpoenas that demanded multiple categories of documents from ICANN. (*See id.*) Yet Plaintiffs waited until September 25, 2014, to seek a six-month extension of discovery—and did so on the eve of when their opposition to ICANN’s Motion to Quash was due, which was after already receiving a six-week extension to file their opposition. (*See id.*) In that intervening period, ICANN responded to Plaintiffs’ subpoenas, provided Plaintiffs with roughly 1,660 pages of documents and specifically identified countless documents that are publicly available on ICANN’s website. (*See id.*) In light of the discovery already taken by Plaintiffs and the ninety-day window between serving their Writs of Attachment and seeking this extension, Plaintiffs have had ample opportunity to conduct discovery. *See, e.g., Hunter v. Dist. of Columbia*, 943 F.2d 69, 73–74 (D.C. Cir. 1991) (holding that “three months” constitutes

“ample time” to request documents).⁴

Moreover, Plaintiffs’ Motion is only the latest in a series of efforts to prolong these proceedings. For example, in their reply brief seeking an extension of time, filed on August 28, Plaintiffs represented to this Court that they would, “within the next week or so,” file a motion seeking additional discovery. (*See* Dkt. No. 116 (Reply to Pls.’ Mot. for Enlargement of Time to Respond to Mot. to Quash) at 8.) But Plaintiffs did not do so for nearly a month. Indeed, they waited until just three business days before their already-extended response to ICANN’s Motion to Quash was due.⁵ (*See* Dkt. No. 129.) Additionally, Plaintiffs never previously indicated that their additional discovery would involve further extensions of the September 30 deadline for responding to ICANN’s Motion. (*See* Dkt. No. 116 at 8; *see also* Dkt. No. 109 (Pls.’ Mot. to Compel Produc. of Docs.)) When Plaintiffs sought a six-week extension in August they implicitly represented that they would comply with the extended deadline by opposing ICANN’s Motion to Quash on September 30, 2014. It is improper for a litigant to request an extension while at the same time planning to pursue a further, indefinite extension of the same motion under the guise of a discovery motion. Plaintiffs’ persistent delay tactics should not be rewarded with an additional six months of discovery.

Finally, Plaintiffs cannot shift to ICANN the blame for their delay by labeling ICANN’s

⁴ *See, e.g., Davis v. G.N. Mortg. Corp.*, 396 F.3d 869, 886 (7th Cir. 2005) (holding that seventy-four days of discovery constitutes “ample time”); *Ameropa Travel v. TWA (In re TWA)*, Case No. 95-293, 1996 U.S. Dist. LEXIS 19845, at *10–11 (D. Del. Dec. 31, 1996) (holding that thirty days was “an ample time frame and opportunity to depose” a witness).

⁵ Worse still, Plaintiffs filed a motion for additional time in only *one* of the seven, separately pending cases on September 25, 2014. In the other six cases, Plaintiffs did not get around to seeking additional time until Sunday, September 28—with only *one* business day remaining to file a response to ICANN’s Motion to Quash. *See, e.g., Weinstein v. Islamic Repub. of Iran*, No. 1:00-cv-2601, Dkt. No. 107 (D.D.C. Sept. 28, 2014); *Stern v. Islamic Repub. of Iran*, No. 1:00-cv-2602, Dkt. No. 46 (D.D.C. Sept. 28, 2014); *Haim v. Islamic Repub. of Iran*, No. 1:02-cv-1811, Dkt. No. 64 (D.D.C. Sept. 28, 2014); *Haim v. Islamic Repub. of Iran*, No. 1:08-cv-520, Dkt. No. 61 (D.D.C. Sept. 28, 2014); *Wyatt v. Syrian Arab Repub.*, No. 1:08-cv-502, Dkt. No. 91 (D.D.C. Sept. 28, 2014); *Calderon-Caldona v. Democratic People’s Repub. of N. Korea*, No. 1:14-mc-648, Dkt. No. 25 (D.D.C. Sept. 28, 2014).

production of documents as “tardy.” (*See* Dkt. No. 129 at 4, 5–6.) As noted, ICANN produced 1,660 pages of documents to Plaintiffs on September 19, 2014—well within this Court’s deadline for responding to ICANN’s Motion to Quash.⁶ Even before that, however, ICANN responded to Plaintiffs’ Writs of Attachment, on July 28, 2014, certifying that ICANN is not “indebted to” the Defendants and that ICANN does not hold any of the Defendants’ “goods, chattels, or credits.” (Dkt. No. 117-1 at ¶ 4; Dkt. No. 105 (ICANN’s Objections to Answer to Writ).) ICANN also sent Plaintiffs a list of all publicly available documents on August 25, 2014, accompanied by detailed references to each of the seven categories of documents Plaintiffs sought, all of which were available publicly well in advance of Plaintiffs’ subpoena. (Dkt. No. 117-1.) Put simply, there was nothing “tardy” about ICANN’s production, and any weaknesses in Plaintiffs’ case are the result of their meritless legal arguments and general “lack of diligence.” *See Pfeil*, 757 F.2d at 857.

E. Plaintiffs’ Discovery Requests Of Other Nonparties Will Spur A Flood Of Satellite Discovery Disputes That Will Take Far Longer Than Six Months To Resolve.

Not only are Plaintiffs’ discovery requests legally and factually unwarranted, but the practical consequences of those requests will be disastrous, flooding this Court with satellite discovery disputes as each of Plaintiffs’ subpoenas of other nonparties will be subject to piecemeal challenge. *See, e.g., Donkeyball Movie, LLC v. Doe*, 810 F. Supp. 2d 20, 30 (D.D.C. 2011) (underscoring concerns about “judicial economy” and “administrative burdens” when facing a potential influx of “factually unique” motions). Indeed, Plaintiffs’ assertion that they will complete their requested discovery within six months is whimsical. More likely, the

⁶ ICANN produced the majority of its documents on September 19, 2014. This followed a two-week period during which the parties drafted and negotiated a consent motion resolving Plaintiffs’ motion to compel—which required extensive meet and confers—as well as the drafting and negotiation of a protective order regarding the production of confidential information. What Plaintiffs fail to acknowledge is that, on August 25, 2014, ICANN offered to produce all responsive documents to Plaintiffs, but Plaintiffs failed to accept ICANN’s proposal until mid-September. (*See* Dkt. No. 117 (ICANN’s Opp’n to Pls.’ Mot. to Compel) at 11.)

sophisticated nonparties that Plaintiffs seek to depose, or collect documents from, will each serve their own objections to Plaintiffs' subpoenas and each seek their own protective orders.

For example, under Rule 45(d), any individual or entity subpoenaed by Plaintiffs will have the right to challenge that subpoena on grounds that, among other things, it subjects them to "undue burden." Fed. R. Civ. P. 45(d)(3)(A)(ii), (iv). Likewise, under Rule 26(c), those same individuals and entities will each have the right to seek a protective order against, or quash, Plaintiffs' discovery demands. Fed. R. Civ. P. 26(c). And because Plaintiffs are seeking discovery *only* from nonparties, this Court will be faced with a slew of separate motions requiring it to carefully analyze the unique, fact-intensive burdens imposed on each of the subpoenaed individuals and entities—ICANN included. *See, e.g., Watts v. SEC*, 482 F.3d 501, 509 (D.C. Cir. 2007) ("[C]oncern for the unwanted burden thrust upon non-parties is a factor entitled to special weight in evaluating the balance of competing needs." (internal quotation marks omitted)). Even if consolidated into an omnibus proceeding, resolving those disputes will entail a massive expenditure of monetary and institutional resources—all so Plaintiffs can verify what commonsense should have told them all along: The .IR, .SY, and .KP ccTLDs (like their TLD analogues, .COM, .GOV, and .ORG) are not attachable property.⁷ *See, e.g., Shpritz*, 393 A.2d at 70.

⁷ Plaintiffs' demand to depose foreign nationals and other individuals living abroad is similarly problematic. (*See* Dkt. No. 129 at 13, ¶¶ 5, 7.) Not only does Rule 45 prohibit depositions of nonparties beyond the 100-mile geographical limit, Fed. R. Civ. P. 45(c), but this Court also "lacks authority to direct a deposition outside of this district—let alone in another country," *see Estate of Esther Klieman v. Palestinian Auth.*, 293 F.R.D. 235, 240 (D.D.C. 2013); *see also* 28 U.S.C. § 1783(a) (providing that United States residents and nationals living abroad may be subpoenaed only when "necessary in the interest of justice," and only when "it is not possible to . . . obtain the production of the document or other thing in any other manner"); *Pain v. United Techs. Corp.*, 637 F.2d 775, 787–89 & n.57 (D.C. Cir. 1980) (stressing that enforcing "a subpoena order against a foreign national on foreign soil would, in certain circumstances, constitute a violation of international law"), overruled on other grounds.

II. PLAINTIFFS' MOTION SEEKS BROAD AND SWEEPING DISCOVERY TO WHICH THEY ARE NOT ENTITLED.

A. Plaintiffs Do Not And Cannot Justify Deposing ICANN's Counsel.

Plaintiffs' Motion brazenly demands depositions of ICANN's counsel, Joe Sims and Jeffrey LeVee, without even attempting to justify such a request. (Dkt. No. 129 at 12–13.) As courts in this jurisdiction have recognized, opposing-counsel depositions “disrupt the effective operation of the adversarial system” by creating “a unique opportunity for harassment,” and by burdening the courts and the parties with “additional pretrial delays and costs.” *See Sterne Kessler Goldstein & Fox, PLLC v. Eastman Kodak Co.*, 276 F.R.D. 376, 380–82 (D.D.C. 2011) (internal quotation marks omitted). In resorting to the “harassing practice of deposing opposing counsel,” Plaintiffs engage in “an adversary trial tactic that does nothing for the administration of justice but rather prolongs and increases the costs of litigation, demeans the profession, and constitutes an abuse of the discovery process.” *Shelton v. Am. Motors Corp.*, 805 F.2d 1323, 1330 (8th Cir. 1986).

Because depositions of opposing parties' counsel are so strongly “disfavored,” *Sterne*, 276 F.R.D. at 380, the burden falls on the party seeking the deposition to prove that it is warranted, *see Coleman v. Dist. of Columbia*, 284 F.R.D. 16, 18 (D.D.C. 2012) (Lamberth, J.). Opposing-counsel deposition are permitted only when “(1) no other means exist to obtain the information than to depose opposing counsel; (2) the information sought is relevant and nonprivileged; and (3) the information is crucial to the preparation of the case.” *Guantanamo Cigar Co. v. Corporacion Habanos, S.A.*, 263 F.R.D. 1, 8 (D.D.C. 2009) (Lamberth, J.) (internal quotation marks omitted); *see also Shelton*, 805 F.2d at 1330 (same).

Here, Plaintiffs have not even attempted to meet this standard—nor can they. First, Plaintiffs cannot show that the information sought from Mr. Sims and Mr. LeVee could be

obtained *only* from them. *See id.* For example, ICANN’s website contains numerous documents and testimonials detailing “ICANN’s authority over the Root Zone” and “its history and control over the Root Zone,” which is the precise information Plaintiffs claim to seek from Mr. Sims and Mr. LeVee. (Dkt. No. 129 at 12–13; Enson Decl. III, ¶¶ 4-7.) Plaintiffs, therefore, have an array of “other means . . . to obtain the information” they seek without “depos[ing] opposing counsel.” *Guantanamo Cigar*, 263 F.R.D. at 8. Second, Plaintiffs cannot show that the information is relevant, as they have not articulated how purported “government contracts granting ICANN authority over the Root Zone” make it any more likely that the .IR, .SY, and .KP ccTLDs are attachable property that ICANN can unilaterally transfer to Plaintiffs. Nor can Plaintiffs explain how Mr. Sims’s and Mr. LeVee’s testimony would not be protected by the attorney-client privilege, considering Mr. Sims’s and Mr. LeVee’s knowledge of these matters arises out of confidential communications between them and their client, ICANN. *See id.* Third, because the general information sought is *not even relevant* to Plaintiffs’ case, they cannot show that deposing Mr. Sims and Mr. LeVee is “crucial” to preparing their case. *See id.* Accordingly, Plaintiffs’ requests to depose ICANN’s counsel must be denied.

B. Plaintiffs Cannot Obtain ICANN’s Private Documents Because They Are Not Related To Any Attachable Property.

Plaintiffs are not entitled to inspect ICANN’s private documents—whether they be financial, technical, or otherwise. Post-judgment discovery of a nonparty-garnishee’s private information is carefully limited. *See, e.g., Burak v. Scott*, 29 F. Supp. 775, 776 (D.D.C. 1939) (protecting from discovery the “assets of persons other than the judgment debtor”). Absent proof of a fraudulent relationship between the garnishee and the judgment-debtor, plaintiffs may not obtain the private information of a nonparty-garnishee. *See, e.g., Falicia v. Advanced Tenant Servs., Inc.*, 235 F.R.D. 5, 8–10 (D.D.C. 2006); *see also Magnaleasing, Inc. v. Staten Island*

Mall, 76 F.R.D. 559, 562 (S.D.N.Y. 1977) (same); *Alpern v. Frishman*, 465 A.2d 828, 828–29 (D.C. 1983) (same).

Here, Plaintiffs demand precisely what the law forbids: The private documents of an honest nonparty-garnishee that do not involve the judgment-debtors’ assets.⁸ For example, Plaintiffs have no right to demand documents related to payments ICANN receives from ccTLD managers, (Dkt. No. 129 at 15–16, ¶¶ 5, 8), as such documents constitute the non-discoverable “assets of persons other than the judgment debtor,” *Burak*, 29 F. Supp. at 776. Likewise, Plaintiffs have no right to demand ICANN’s internal policy memoranda, governmental correspondence regarding the IANA functions, or information relating to *other* ccTLDs that allegedly “have been re-delegated or re-assigned by ICANN.” (Dkt. No. 129 at 14–16, ¶¶ 1–4, 7.) Because ICANN has certified under oath that such documents have no connection with Defendants, (Dkt. Nos. 105 & 106-2, ¶¶ 4–5), Plaintiffs’ unreasonable discovery demands fail as a matter of law. *See, e.g., Strick Corp. v. Thai Teak Prods. Co.*, 493 F. Supp. 1210, 1217–18 (E.D. Pa. 1980) (holding that garnishees’ personal documents are not discoverable unless a judgment-creditor proves a fraudulent relationship between the garnishee and the debtor).

C. Plaintiffs’ Request For Discovery Regarding The Re-Delegation And Monetization Of Other ccTLDs Is Irrelevant Because It Cannot Yield Evidence Related To The Question Of Whether The .IR, .SY, and .KP ccTLDs Are *Attachable* Property.

The information Plaintiffs seek regarding the re-delegations and monetization of other ccTLDs is legally and factually irrelevant because it cannot lead to evidence of attachable assets.

See, e.g., Republic of Argentina v. NML Capital, Ltd., 134 S. Ct. 2250, 2257 (2014)

(“[I]nformation that could not possibly lead to executable assets is simply not ‘relevant’ . . . in

⁸ The same is true of Verisign’s and Neustar’s financial documents as well as those policy documents belonging to other Internet organizations. (See Dkt. No. 129 at 15–16.) Absent proof that those nonparties fraudulently concealed the Defendants’ assets, Plaintiffs have no basis for obtaining their otherwise private financial or institutional information. *See Falicia*, 235 F.R.D. at 8–10.

the first place.”); *see also Caisson Corp. v. Cnty. W. Bldg. Corp.*, 62 F.R.D. 331, 334 (E.D. Pa. 1974) (holding that information is legally and factually irrelevant unless it directly pertains to “the goal of discovering concealed assets of the judgment debtor”).

Although Plaintiffs seek to rebut ICANN’s Motion to Quash by obtaining documents showing that ICANN “is fully capable of transferring” ccTLDs, (Dkt. No. 129 at 14, ¶ 2), such information is irrelevant. ICANN has never contested its ability to evaluate and recommend a re-delegation of a ccTLD to the U.S. Government, under appropriate circumstances—only its ability to do so *unilaterally* without first tendering a proposal to NTIA and receiving the approval of the U.S. Department of Commerce. Documents to the contrary do not exist and the further production of documents demonstrating this fact is irrelevant.

Similarly, Plaintiffs seek documents and depositions to show that ccTLDs can be monetized, but such discovery would be irrelevant to Plaintiffs’ central discovery issue: Whether the .IR, .SY, and .KP ccTLDs are *attachable property*. As ICANN has explained, gTLDs and ccTLDs—like .COM, .GOV, and .US—are a type of service contract, not unlike any other agreement for informational or telecommunication services. Even if an individual’s rights to receive performance under a service contract can be monetized, the service itself does not constitute attachable property. *See, e.g., Sperry*, 1988 WL 129733, at *2; *see also Shpritz*, 393 A.2d at 70. As a result, any document related to the supposed “monetization” of ccTLDs has no nexus with “the elements of the underlying cause of action,” and is therefore irrelevant. *See Food Lion, Inc. v. United Food & Commercial Workers Union*, 103 F.3d 1007, 1014 (D.C. Cir. 1997) (“[N]o one would suggest that discovery should be allowed of information that has no conceivable bearing on the case.” (internal quotation marks omitted)).

So too with Plaintiffs’ requested depositions on the monetization of ccTLDs. Plaintiffs,

for example, seek to depose Jeff Neuman, Vice President of NeuStar, Inc., a publicly traded U.S. company. (Dkt. No. 129 at 13, ¶ 3.) Plaintiffs assert that Mr. Neuman will “counter ICANN’s assertion that ccTLD’s are not property,” because Plaintiffs claim that his company “purchased Columbia’s [sic] ccTLD (.CO) for \$109 million in 2014.” (*Id.*) Plaintiffs’ own exhibits, however, reveal that NeuStar did *not* “purchase” the “.CO” ccTLD. (*See* Dkt. No. 129-2 at 63–65 (NeuStar’s SEC 10-Q filing).) Rather, NeuStar acquired the entity that was “the *exclusive operator*” of the “.co” top-level domain,” an entity known as “.CO Internet S.A.S.” (*Id.* (emphasis added).) Even more to the point, NeuStar’s SEC filings characterize “top-level domains” quite correctly as “registry *services*”—just as ICANN has throughout this matter. (*Id.* (emphasis added).) Plaintiffs’ own exhibit, therefore, refutes their claim that deposing Mr. Neuman would reveal evidence that ccTLDs are “property.”

The same is true of Plaintiffs’ request to depose the “Person Most Knowledgeable from Verisign regarding Verisign’s purchase of .TV and .CC.” (Dkt. No. 129 at 13, ¶ 6.) No such person exists—Verisign has never “purchase[d]” any ccTLD. In 2001, Verisign acquired the companies that acted as the ccTLD managers of the .TV and .CC ccTLDs. (*Accord* Dkt. No. 129-2 at 92 (Pls.’ Ex. G) (noting that Verisign is a “manager of web addresses” that “manage[s]” and “operates the .tv domain”).) As with NeuStar’s acquisition of “.CO Internet S.A.S.,” Verisign’s acquisition of two ccTLDs *managers* does not mean that it owns a ccTLD any more than AT&T owns an area code or UPS owns a zip code. Put simply, depositions of Verisign officials will not provide “evidence that ccTLDs are economic assets . . . similar to a piece of real estate.” (*See id.* at 6, ¶ 6(f) (Gebelin Decl.)) Not only is Plaintiffs’ analogy inapt, but their requested depositions are also not “reasonably calculated” to provide them evidence necessary “to enforce [their] judgment[s].” *See Falicia*, 235 F.R.D. at 10.

D. Much Of Plaintiffs’ Requested Discovery Is Duplicative And Unnecessary Because That Information Is Publicly Available Or Has Already Been Disclosed.

Courts “have an obligation to construe the Federal Rules of Civil Procedure ‘to secure the just, speedy, and inexpensive determination of every action and proceeding.’” *Segar v. Holder*, 277 F.R.D. 9, 17 (D.D.C. 2011) (quoting Fed. R. Civ. P. 1). As a result, even relevant information may not be discovered “where no need is shown.” *Mannington Mills, Inc. v. Armstrong World Indus.*, 206 F.R.D. 525, 528–29 (D. Del. 2002). Accordingly, courts must deny discovery, particularly that of a nonparty, when “the same information [i]s otherwise available,” *Cusumano v. Microsoft Corp.*, 162 F.3d 708, 716 (1st Cir. 1998), or when the information has already been produced, *see Segar*, 277 F.R.D. at 17–18.

Here, Plaintiffs’ discovery requests are duplicative and unnecessary as the information sought can be obtained from other “more convenient, less burdensome, [and] less expensive” sources. *See* Fed. R. Civ. P. 26(b)(2)(C)(i). Indeed, the public domain offers much of the information Plaintiffs seek free of charge. As a general matter, all of the information Plaintiffs seek is available on ICANN’s website, which hosts the following categories of documents:

- (1) Annual reports;
- (2) Articles of Incorporation;
- (3) Board meeting transcripts, minutes, and resolutions;
- (4) ICANN’s budgets;
- (5) Bylaws, both current and previous;
- (6) Correspondence;
- (7) Financial information;
- (8) Litigation documents;
- (9) Major agreements;

(10) Monthly registry reports;

(11) Operating plans;

(12) Policy documents;

(13) Speeches, presentations, and publications;

(14) Strategic plans;

(15) Material information relating to ICANN's Address Supporting Organization ("ASO"), including ASO policy documents, Regional Internet Registry ("RIR") policy documents, guidelines and procedures, meeting agendas and minutes, presentations, routing statistics, and information regarding the RIRs;

(16) Material information relating to ICANN's Generic Supporting Organization ("GNSO"), including correspondence and presentations, council resolutions, requests for comments, draft documents, policies, and reference documents;

(17) Material information relating to ICANN's country code Names Supporting Organization ("ccNSO"), including meeting agendas, minutes, reports, and presentations;

(18) Material information relating to the At Large Advisory Committee ("ALAC"), including correspondence, statements, and meeting minutes;

(19) Material information relating to the Governmental Advisory Committee ("GAC"), including operating principles, gTLD principles, ccTLD principles, principles regarding gTLD Whois issues, communiqués, and meeting transcripts, and agendas;

(20) Material information relating to the Root Server Advisory Committee ("RSSAC"), including meeting minutes and information surrounding ongoing projects; and

(21) Material information relating to the Security and Stability Advisory Committee ("SSAC"), including its charter, various presentations, work plans, reports, and advisories.

(Enson Decl. III, ¶¶ 2–3, Ex. A.)

More specifically, the information Plaintiffs seek can be found as follows:

- With their Motion, Plaintiffs seek discovery regarding ICANN’s formation and operations, ICANN’s management of the Root Zone Database, ICANN’s contracts with the United States government regarding the Root Zone Database, the IANA functions ICANN performs and the ccNSO. (Dkt. No. 129 at 12–13, ¶ 2; 15, ¶ 3; 15, ¶ 6.) All of this information is available on the Welcome, Resources and Strategic Planning webpages hosted on ICANN’s website. (Enson Decl. III, ¶¶ 4-7, Exs. B-F.)
- Plaintiffs also seek discovery regarding Internet Coordination Policy 1 (“ICP-1”). (Dkt. No. 129 at 14, ¶ 1.) Information about ICP-1 is publicly available on ICANN’s website. (Enson Decl. III, ¶ 8, Ex. G.)
- Plaintiffs seek discovery regarding ccTLDs in general, ccTLD managers, certain ccTLD delegations and re-delegations and agreements by which ICANN receives funds from ccTLD managers. (Dkt. No. 129 at 13, ¶¶ 3, 5, 6, 7; 14, ¶ 2; 16 ¶ 8.) ICANN’s website contains volumes of documents and papers, going back as far as 2000, regarding ICANN’s involvement with ccTLDs, standards and principles for ccTLD operations, overviews of ccTLD delegations and re-delegations, ICANN reports regarding ccTLD delegations and re-delegations, agreements with ccTLD Managers and delegation reports for each ccTLD, which lists the entities and servers that support each of these ccTLDs. (Enson Decl. III, ¶ 9, Exs. H-K.)
- And there is still more information regarding the IANA functions that ICANN performs and the ccNSO located on two separate websites hosted by ICANN, <http://www.iana.org/> and <http://ccnso.icann.org/>. (*Id.* at ¶ 10.)

- Finally, Plaintiffs seek discovery regarding a presentation given by ICANN’s Kim Davies during an ICANN meeting in Marrakech. (Dkt. No. 129 at 15, ¶ 4.) The Presentations webpage on ICANN’s IANA website contains not only Mr. Davies’ Marrakech presentation, but a multitude of other IANA presentations going back as far as 2005. (Enson Decl. III, ¶ 11, Ex. L.)⁹

Likewise, ICANN has previously directed Plaintiffs to all of the publicly available records and reports relating to the .IR, .SY, and .KP ccTLDs, and ICANN has produced over 1,600 pages of non-public communications between ICANN and the .IR, .SY, and .KP ccTLD Mangers. (See Dkt. No. 117-1 at 9–10.)

* * *

All of the above underscores a simple, but stark point. Plaintiffs’ overbroad discovery requests are calculated to achieve delay, not to unearth evidence relevant to collecting their judgments against Defendants. By seeking “[*a*ll documents relating to the IANA function,” “[*a*ll documents related to the ccNSO,” and “[*a*ll documents” about ccTLD contracts, (see Dkt. No. 129 at 15–16 (emphases added)), Plaintiffs once again engage in an impermissible fishing expedition. See *Huthnance*, 255 F.R.D. at 289 (holding that a “request for *all* documents . . . at *any time* is overly broad.” (emphasis added)). But the irony here is Plaintiffs have access to *all* of these documents on ICANN’s websites. In light of the numerous objections to each item in Plaintiffs’ discovery wish list, Plaintiffs’ discovery requests should be denied in their entirety. Because Plaintiffs cannot show that their requests are “reasonably calculated” to provide

⁹ It is impossible to fully describe the enormous amount of information that ICANN provides on its website. ICANN therefore encourages the Court to visit <https://www.icann.org/resources/pages/didp-2012-02-25-en>, to review the listing of information ICANN provides publicly, much of which contains the very information Plaintiffs seek.

evidence relevant to enforcing their judgments, *see Falicia*, 235 F.R.D. at 10, the burden of their demands “is necessarily undue,” *see AF Holdings*, 752 F.3d at 995.

III. TO THE EXTENT PLAINTIFFS ARE PERMITTED TO TAKE ADDITIONAL DISCOVERY, THEY SHOULD BE REQUIRED TO PAY FOR ICANN’S DISCOVERY COSTS.

In the event Plaintiffs are permitted to take any additional discovery, they should be required to reimburse nonparty ICANN for its compliance costs—including attorneys’ fees and other expenses. *See, e.g.*, Fed. R. Civ. P. 45(d)(1) (mandating such cost shifting). When compliance with a subpoena imposes significant expenses on a nonparty, “the court must protect the nonparty by requiring the party seeking discovery to bear at least enough of the expense to render the remainder ‘non-significant.’” *Linder v. Calero-Portocarrero*, 251 F.3d 178, 182 (D.C. Cir. 2001) (finding \$200,000 significant); *see also Williams v. City of Dallas*, 178 F.R.D. 103, 112–14 (N.D. Tex. 1998) (finding \$9,000 significant); *United States v. Blue Cross Blue Shield of Mich.*, Case No. 10-CV-14155, 2012 U.S. Dist. LEXIS 146403, at *8–9 (E.D. Mich. Oct. 11, 2012) (finding \$14,720 and \$16,127 significant). In determining the amount of reimbursement, courts balance several factors, including whether the nonparty has an interest in the outcome of the case and whether the nonparty can more readily bear the costs. *Linder*, 251 F.3d at 182.

Under these standards, ICANN is entitled to full reimbursement for its discovery costs. Not only will ICANN incur significant costs if Plaintiffs are allowed six months of additional discovery, *see id.*, but ICANN’s status as a not for profit nonparty also entitles it to “special protection against the time and expense of complying with subpoenas,” *see Exxon Shipping Co. v. U.S. Dept. of Interior*, 34 F.3d 774, 779 (9th Cir. 1994). First, ICANN has no interest in Plaintiffs’ underlying suit. ICANN was not involved in the original litigation against Defendants, it has no financial interest in or ties with Defendants, and it does not oppose

Plaintiffs' ability to collect on their judgments. *Cf. McKnight & Kennedy, LLC v. CDW Gov't, Inc. (In re Folliard)*, Case No. 10-mc-789, 2012 U.S. Dist. LEXIS 35257, at *6–7 (D.D.C. March 16, 2012) (noting that a nonparty may have an interest in the outcome of a case when it “was involved in litigation arising out of the same facts or was substantially involved in the underlying transaction”). Indeed, ICANN is quite sympathetic to Plaintiffs' underlying claims against Defendants as well as Plaintiffs' injuries. But Plaintiffs should not abuse that sympathy and force ICANN to incur expensive discovery costs. Second, ICANN is in no position to bear the costs of this discovery. As noted, ICANN is a not-for-profit entity that does not retain private revenues beyond its operating costs.¹⁰ Diverting resources to Plaintiffs' discovery efforts will destabilize ICANN's finances and impair its ability to serve the global Internet community. Because Plaintiffs have not yet propounded specific discovery requests on ICANN, ICANN cannot estimate precisely what it will cost to provide Plaintiffs with the discovery they seek. But it is fair to say that ICANN's compliance costs will be “significant.”

¹⁰ In these proceedings, Plaintiffs have repeatedly characterized ICANN as some sort of monopolist enjoying large fees associated with applications to operate new gTLDs. This is simply not the case. ICANN is a public benefit nonprofit corporation. (Enson Decl. III, ¶ 12, Ex. M.) As set forth in Footnote 1 of Section 4.3 of ICANN's Applicant Guidebook, all fees associated with ICANN's new gTLD program are intended to offset ICANN's administrative costs. (*Id.*) ICANN intends to return to the community any proceeds above costs via a foundation that has a transparent way to allocate funds for projects that are of interest to the greater Internet community. (*Id.*)

CONCLUSION

For the foregoing reasons, ICANN respectfully requests that the Court deny Plaintiffs' Motion for a six-month discovery extension and instead proceed to adjudicate the legal merits of ICANN's Motion to Quash. To the extent that any further discovery is ordered, ICANN respectfully requests an order requiring Plaintiffs to reimburse ICANN for its discovery costs, including attorneys' fees and other expenses. A proposed Order is attached.

Dated: October 14, 2014

Respectfully submitted,

/s/ Noel J. Francisco

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CERTIFICATE OF SERVICE

I certify that on October 14, 2014, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, causing it to be served on all registered users to be noticed in this matter, including:

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Counsel for Plaintiff

Dated: October 14, 2014

/s/ Noel J. Francisco

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Jenny Rubin, et al.)
)
Plaintiffs,)
) CIVIL ACTION NO. 01-1655-RCL
v.)
)
The Islamic Republic of Iran, et al.)
)
Defendants.)
)

Susan Weinstein, et al.)
)
Plaintiffs,)
) CIVIL ACTION NO. 00-2601-RCL
v.)
)
The Islamic Republic of Iran, et al.)
)
Defendants.)
)

Seth Charles Ben Haim, et al.)
)
Plaintiffs,)
) CIVIL ACTION NO. 02-1811-RCL
v.) CIVIL ACTION NO. 08-520-RCL
)
)
The Islamic Republic of Iran, et al.)
)
Defendants.)
)

Ruth Calderon-Cardona, et al.)

Plaintiffs,)

v.)

Democratic People's Republic of Korea, et)
al.)

Defendants.)

MISC. NO. 14-648-RCL

Mary Nell Wyatt, et al.)

Plaintiffs,)

v.)

Syrian Arab Republic, et al.)

Defendants.)

CIVIL ACTION NO. 08-502-RCL

Shaul Stern, et al.)

Plaintiffs,)

v.)

The Islamic Republic of Iran, et al.)

Defendants.)

CIVIL ACTION NO. 00-2602-RCL

**DECLARATION OF ERIC P. ENSON IN SUPPORT OF NONPARTY
ICANN'S OPPOSITION TO PLAINTIFFS' MOTION FOR
SIX-MONTH DISCOVERY PERIOD**

I, Eric P. Enson, declare and affirm as follows:

1. I am a partner with the law firm of Jones Day, am a member of the California Bar and have been admitted *pro hac vice* in the above-referenced matters. Jones Day is counsel of record to the Internet Corporation for Assigned Names and Numbers ("ICANN") in these actions. I have personal knowledge of the matters set forth herein and am competent to testify to those matters. I make this declaration in support of Nonparty ICANN's Opposition to Plaintiffs' Motion for Six-Month Discovery Period ("Motion").

2. As part of its commitment to operate in an open and transparent manner, ICANN publicly posts on its website documents and information regarding virtually every aspect of ICANN's operations, policies and policy development. Attached hereto as Exhibit A is a true and correct copy of a listing of the comprehensive set of materials that ICANN makes available on its website as a matter of course, which is also *available at* <https://www.icann.org/resources/pages/didp-2012-02-25-en>.

3. As set forth in Exhibit A, ICANN publicly posts on its website documents that fall into the following twenty-one categories: (1) Annual reports; (2) Articles of Incorporation; (3) Board meeting transcripts, minutes and resolutions; (4) ICANN's budgets; (5) Bylaws, both current and previous; (6) Correspondence; (7) Financial information; (8) Litigation documents; (9) Major agreements; (10) Monthly registry reports; (11) Operating plans; (12) Policy documents; (13) Speeches, presentations and publications; (14) Strategic plans; (15) Material information relating to ICANN's Address Supporting Organization, including policy documents, Regional Internet Registry ("RIR") policy documents, guidelines and procedures, meeting agendas and minutes,

presentations, routing statistics, and information regarding the RIRs; (16) Material information relating to ICANN's Generic Supporting Organization, including correspondence and presentations, council resolutions, requests for comments, draft documents, policies, and reference documents; (17) Material information relating to ICANN's country code Names Supporting Organization ("ccNSO"), including meeting agendas, minutes, reports, and presentations; (18) Material information relating to the At Large Advisory Committee, including correspondence, statements, and meeting minutes; (19) Material information relating to the Governmental Advisory Committee, including operating principles, gTLD principles, ccTLD principles, principles regarding gTLD Whois issues, communiqués, and meeting transcripts, and agendas; (20) Material information relating to the Root Server Advisory Committee ("RSSAC"), including meeting minutes and information surrounding ongoing projects; and (21) Material information relating to the Security and Stability Advisory Committee, including its charter, various presentations, work plans, reports, and advisories. By clicking on the links provided on Exhibit A, large volumes of information, data and documents relating to these twenty-one categories is available, many of which encompass the discovery Plaintiffs seek with their Motion.

4. More specifically, with their Motion, Plaintiffs seek discovery regarding ICANN's formation and operations, ICANN's management of the Root Zone Database, ICANN's contracts with the United States government regarding the Root Zone Database, the IANA functions ICANN performs and the ccNSO. (Dkt. No. 129 at 12-13, ¶ 2; 15, ¶ 3; 15, ¶ 6.) All of this information is available on the Welcome, Resources and Strategic Planning webpages on ICANN's website, as set forth below.

5. Attached hereto as Exhibit B is a true and correct copy of ICANN's Welcome webpage,

which is also *available at* <https://www.icann.org/resources/pages/welcome-2012-02-25-en>. ICANN's Welcome webpage, and the links embedded in that webpage, contain information about ICANN's formation, ICANN's mission, ICANN's management and organization and ICANN's policy development. ICANN's Welcome webpage also includes information about, and links to, ICANN's supporting organizations and advisory committees, including the ccNSO and the RSSAC.

6. Attached hereto as Exhibit C is a true and correct copy of ICANN's Resources webpage, which is also *available at* <https://www.icann.org/resources>. ICANN's Resources webpage contains information about ccTLDs, internationalized domain names, ICANN's governance, ICANN policy and the top-level domain ("TLD") registries, which are the entities that operate the Internet's TLDs. Within the Governance link, on the left-hand side of ICANN's Resources webpage, a true and correct copy of which is attached hereto as Exhibit D and is also *available at* <https://www.icann.org/resources/pages/governance-2012-02-25-en>, is a listing of ICANN's governing documents, such as ICANN's Articles of Incorporation and Bylaws. Within the Agreements link, located on the Governance webpage, a true and correct copy of which is attached hereto as Exhibit E and is also *available at* <https://www.icann.org/resources/pages/agreements-2012-02-25-en>, is a listing and links to every major agreement ICANN has entered into since its inception, including agreements with the United States government regarding ICANN's performance of the IANA functions and management of the Root Zone Database.

7. Attached hereto as Exhibit F is a true and correct copy of ICANN's Strategic Planning webpage, which is also *available at* <https://www.icann.org/resources/pages/strategic-engagement-2013-10-10-en>. ICANN's Strategic Planning webpage contains information about,

and links to, ICANN's operations, strategic objectives, operating plans, and supporting materials.


8. Plaintiffs seek discovery regarding Internet Coordination Policy 1 ("ICP-1"). (Dkt. No. 129 at 14, ¶ 1.) Attached hereto as Exhibit G is a true and correct copy of ICANN's webpage containing information about and links to ICP-1, which is also *available at* <https://www.icann.org/resources/pages/delegation-2012-02-25-en>.

9. Plaintiffs seek discovery regarding ccTLDs in general, ccTLD managers, certain ccTLD delegations and re-delegations and agreements by which ICANN receives funds from ccTLD managers. (Dkt. No. 129 at 13, ¶¶ 3, 5, 6, 7; 14, ¶ 2; 16 ¶ 8.) Attached hereto as Exhibit H is a true and correct copy of ICANN's ccTLD webpage, which is also *available at* <https://www.icann.org/resources/pages/cctlds-21-2012-02-25-en>. The Background Materials link on the left-hand side of the ccTLD webpage, which is attached hereto as Exhibit I and is also *available at* <https://www.icann.org/resources/pages/background-2012-02-25-en>, contains numerous documents and papers, going back as far as 2000, regarding ICANN's involvement with ccTLDs, standards and principles for ccTLD operations, overviews of ccTLD delegations and re-delegations and ICANN reports regarding ccTLD delegations and re-delegations. The Agreements link on the left-hand side of the ccTLD webpage, which is attached hereto as Exhibit J and is also *available at* <https://www.icann.org/resources/pages/cctlds-2012-02-25-en>, contains every existing agreement, going back as far as 2000, between ICANN and ccTLD managers regarding operation of a ccTLD. The Root Zone Database link on the left-hand side of the ccTLD webpage, which is attached hereto as Exhibit K and is also *available at* <http://www.iana.org/domains/root/db>, contains a listing of every top-level domain currently in existence. In addition, the delegation records for each of these TLDs, which lists the entities and servers that support each of these TLDs, can be found by clicking on the TLD links.

10. Although information regarding the IANA functions that ICANN performs and the ccNSO is contained in many of the links listed above, ICANN also hosts an IANA website, which can be found at <http://www.iana.org/>, and a ccNSO website which can be found at <http://ccnso.icann.org/>. Both of these websites contain a wealth of information about the IANA functions and ccTLDs.
11. Finally, Plaintiffs seek discovery regarding a presentation given by ICANN's Kim Davies during an ICANN meeting in Marrakech. (Dkt. No. 129 at 15, ¶ 4.) Attached hereto as Exhibit L is a true and correct copy of the Presentations webpage on ICANN's IANA website, which contains Mr. Davies' presentation and a multitude of other IANA presentations going back as far as 2005, and which is also *available at* <https://www.iana.org/about/presentations>.
12. Attached hereto as Exhibit M is a true and correct copy of a page from ICANN's Applicant Guidebook for the new gTLD program.

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct.

This declaration was signed on October 14, 2014 at Los Angeles, California.

A handwritten signature in black ink, appearing to read 'Eric P. Enson', written over a horizontal line.

Eric P. Enson

Exhibit A

CIVIL ACTION NOS. 00-2602-RCL; 00-2601-RCL; 01-1655-RCL;
02-1811-RCL; 08-520-RCL; 14-648-RCL; 08-502-RCL

Translations Français Español العربية

Русский 中文

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ICANN Documentary Information Disclosure Policy

NOTE: With the exception of personal email addresses, phone numbers and mailing addresses, DIDP Requests are otherwise posted in full on [ICANN's website](#), unless there are exceptional circumstances requiring further redaction.

[ICANN's](#) Documentary Information Disclosure Policy (DIDP) is intended to ensure that information contained in documents concerning [ICANN's](#) operational activities, and within [ICANN's](#) possession, custody, or control, is made available to the public unless there is a compelling reason for confidentiality.

A principal element of [ICANN's](#) approach to transparency and information disclosure is the identification of a comprehensive set of materials that [ICANN](#) makes available on its website as a matter of course.

Specifically, [ICANN](#) has:

- Identified many of the categories of documents that are already made public as a matter of due course
- Developed a time frame for responding to requests for information not already publicly available

- RFPs • Identified specific conditions for nondisclosure of information
- Litigation • Described the mechanism under which requestors may appeal a denial of disclosure
- Newsletter
- Correspondence

Groups	Public Documents
Contractual Compliance	ICANN posts on its website at www.icann.org , numerous categories of documents in due course. A list of those categories follows:
Registrars	<ul style="list-style-type: none"> • Annual Reports – http://www.icann.org/en/about/annual-report
Registries	<ul style="list-style-type: none"> • Articles of Incorporation – http://www.icann.org/en/about/governance/articles
ccTLDs	
Internationalized Domain Names	<ul style="list-style-type: none"> • Board Meeting Transcripts, Minutes and Resolutions – http://www.icann.org/en/groups/board/meetings • Budget – http://www.icann.org/en/about/financials
Universal Acceptance Initiative	<ul style="list-style-type: none"> • Bylaws (current) – http://www.icann.org/en/about/governance/bylaws
Policy	<ul style="list-style-type: none"> • Bylaws (archives) – http://www.icann.org/en/about/governance/bylaws/archive
Public Comment	<ul style="list-style-type: none"> • Correspondence – http://www.icann.org/correspondence/
Contact	<ul style="list-style-type: none"> • Financial Information – http://www.icann.org/en/about/financials
Help	<ul style="list-style-type: none"> • Litigation documents – http://www.icann.org/en/news/litigation • Major agreements – http://www.icann.org/en/about/agreements • Monthly Registry reports – http://www.icann.org/en/resources/registries/reports • Operating Plan – http://www.icann.org/en/about/planning • Policy documents – http://www.icann.org/en/general/policy.html • Speeches, Presentations & Publications – http://www.icann.org/presentations

- Strategic Plan – <http://www.icann.org/en/about/planning>
- Material information relating to the Address Supporting Organization (ASO) – <http://aso.icann.org/docs> including ASO policy documents, Regional Internet Registry (RIR) policy documents, guidelines and procedures, meeting agendas and minutes, presentations, routing statistics, and information regarding the RIRs
- Material information relating to the Generic Supporting Organization (GNSO) – <http://gns0.icann.org> – including correspondence and presentations, council resolutions, requests for comments, draft documents, policies, reference documents (see <http://gns0.icann.org/reference-documents.htm>), and council administration documents (see <http://gns0.icann.org/council/docs.shtml>).
- Material information relating to the country code Names Supporting Organization (ccNSO) – <http://ccnso.icann.org> – including meeting agendas, minutes, reports, and presentations
- Material information relating to the At Large Advisory Committee (ALAC) – <http://atlarge.icann.org> – including correspondence, statements, and meeting minutes
- Material information relating to the Governmental Advisory Committee (GAC) – <http://gac.icann.org/web/index.shtml> – including operating principles, gTLD principles, ccTLD principles, principles regarding gTLD Whois issues, communiqués, and meeting transcripts, and agendas
- Material information relating to the Root Server Advisory Committee (RSSAC) – <http://www.icann.org/en/groups/rssac> – including meeting minutes and information surrounding ongoing projects
- Material information relating to the Security and Stability Advisory Committee (SSAC) – <http://www.icann.org/en/groups/ssac> – including its charter, various presentations, work plans, reports, and advisories

Responding to Information Requests

If a member of the public requests information not already publicly available, ICANN will respond, to the extent feasible, to reasonable requests within 30 calendar days of receipt of the request. If that time frame will not be met, ICANN will inform the requester in writing as to when a response will be provided, setting forth the reasons necessary for the extension of time to respond. If ICANN denies the information request, it will provide a written statement to the requestor identifying the reasons for the denial.

Defined Conditions for Nondisclosure

ICANN has identified the following set of conditions for the nondisclosure of information:

- Information provided by or to a government or international organization, or any form of recitation of such information, in the expectation that the information will be kept confidential and/or would or likely would materially prejudice ICANN's relationship with that party.
- Internal information that, if disclosed, would or would be likely to compromise the integrity of ICANN's deliberative and decision-making process by inhibiting the candid exchange of ideas and communications, including internal documents, memoranda, and other similar communications to or from ICANN Directors, ICANN Directors' Advisors, ICANN staff, ICANN consultants, ICANN contractors, and ICANN agents.
- Information exchanged, prepared for, or derived from the deliberative and decision-making process between ICANN, its constituents, and/or other entities with which ICANN cooperates that, if disclosed, would or would be likely to compromise the integrity of the deliberative and decision-making process between and among ICANN, its constituents, and/or other entities with which ICANN cooperates by inhibiting the candid exchange of ideas and communications.
- Personnel, medical, contractual, remuneration, and similar records relating to an individual's personal information, when the disclosure of such information would or likely would constitute an invasion of personal privacy, as well as

proceedings of internal appeal mechanisms and investigations.

- Information provided to ICANN by a party that, if disclosed, would or would be likely to materially prejudice the commercial interests, financial interests, and/or competitive position of such party or was provided to ICANN pursuant to a nondisclosure agreement or nondisclosure provision within an agreement.
- Confidential business information and/or internal policies and procedures.
- Information that, if disclosed, would or would be likely to endanger the life, health, or safety of any individual or materially prejudice the administration of justice.
- Information subject to the attorney– client, attorney work product privilege, or any other applicable privilege, or disclosure of which might prejudice any internal, governmental, or legal investigation.
- Drafts of all correspondence, reports, documents, agreements, contracts, emails, or any other forms of communication.
- Information that relates in any way to the security and stability of the Internet, including the operation of the L Root or any changes, modifications, or additions to the root zone.
- Trade secrets and commercial and financial information not publicly disclosed by ICANN.
- Information requests: (i) which are not reasonable; (ii) which are excessive or overly burdensome; (iii) complying with which is not feasible; or (iv) are made with an abusive or vexatious purpose or by a vexatious or querulous individual.

Information that falls within any of the conditions set forth above may still be made public if ICANN determines, under the particular circumstances, that the public interest in disclosing the information outweighs the harm that may be caused by such disclosure. Further, ICANN reserves the right to deny disclosure of information under conditions not designated above if ICANN determines that

the harm in disclosing the information outweighs the public interest in disclosing the information.

ICANN shall not be required to create or compile summaries of any documented information, and shall not be required to respond to requests seeking information that is already publicly available.

Appeal of Denials

To the extent a requestor chooses to appeal a denial of information from ICANN, the requestor may follow the Reconsideration Request procedures or Independent Review procedures, to the extent either is applicable, as set forth in Article IV, Sections 2 and 3 of the ICANN Bylaws, which can be found at <http://www.icann.org/en/about/governance/bylaws>.

DIDP Requests and Responses

Request submitted under the DIDP and ICANN responses are available here: <http://www.icann.org/en/about/transparency>

Guidelines for the Posting of Board Briefing Materials

The posting of Board Briefing Materials on the Board Meeting Minutes page (at <http://www.icann.org/en/groups/board/meetings>) is guided by the application of the DIDP. The Guidelines for the Posting of Board Briefing Materials are available at <http://www.icann.org/en/groups/board/documents/briefing-materials-guidelines-21mar11-en.htm>.

To submit a request, send an email to didp@icann.org

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Glossary: Internet Corporation for Assigned Names and Numbers

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Exhibit B

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Welcome to [ICANN](#)!

Thanks for visiting! If you're new to [ICANN](#), we built this page for you. It contains resources that can help you quickly understand who we are and what we do.

Welcome to [ICANN](#)'s global community supporting the vision of "one world, one Internet." We warmly encourage your participation.

What Does [ICANN](#) Do?

To reach another person on the Internet you have to type an address into your computer -- a name or a number. That address must be unique so computers know where to find each other. [ICANN](#) coordinates these unique identifiers across the world. Without that coordination, we wouldn't have one global Internet.

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In more technical terms, the Internet Corporation for Assigned Names and Numbers ([ICANN](#)) coordinates the Internet Assigned Numbers Authority ([IANA](#)) functions, which are key technical services critical to the continued operations of the Internet's underlying address book, the [Domain Name System \(DNS\)](#). The [IANA](#) functions include: (1) the coordination of the assignment of technical protocol parameters including the management of the address and routing parameter area ([ARPA](#)) top-level domain; (2) the administration of certain responsibilities associated with Internet

Registrars	<p>DNS root zone management such as generic (gTLD) and country code (ccTLD) Top-Level Domains; (3) the allocation of Internet numbering resources; and (4) other services. ICANN performs the IANA functions under a U.S. Government contract.</p>
Registries	
ccTLDs	
Internationalized Domain Names	<p>Learn more. You can download a free <i>Beginner's Guide to Domain Names</i> and a <i>Beginner's Guide to Internet Protocol (IP) Addresses</i> from our E-Learning pages.</p>
Universal Acceptance Initiative	<h2>How Does ICANN Work?</h2> <p>Besides providing technical operations of vital DNS resources, ICANN also defines policies for how the "names and numbers" of the Internet should run. The work moves forward in a style we describe as the "bottom-up, consensus-driven, multi-stakeholder model:"</p>
Policy	<ul style="list-style-type: none">• Bottom up. At ICANN, rather than the Board of Directors solely declaring what topics ICANN will address, members of sub-groups in ICANN can raise issues at the grassroots level. Then, if the issue is worth addressing and falls within ICANN's remit, it can rise through various Advisory Committees and Supporting Organizations until eventually policy recommendations are passed to the Board for a vote.• Consensus-driven. Through its By-laws, processes, and international meetings, ICANN provides the arena where all advocates can discuss Internet policy issues. Almost anyone can join most of ICANN's volunteer Working Groups, assuring broad representation of the world's perspectives. Hearing all points of view, searching for mutual interests, and working toward consensus take time, but the process resists capture by any single interest— an important consideration when managing a resource as vital as the global Internet.• Multi-stakeholder model. ICANN's inclusive approach treats the public sector, the private sector, and technical experts as peers. In the ICANN community, you'll find registries, registrars, Internet Service Providers (ISPs), intellectual property advocates, commercial and business interests, non-commercial and non-profit interests, representation from more
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than 100 governments, and a global array of individual Internet users. All points of view receive consideration on their own merits. ICANN's fundamental belief is that all users of the Internet deserve a say in how it is run.

To learn more about ICANN's policy development processes:

- [Frequently Asked Questions](#)
- [Diagram of the Multi-Stakeholder Model](#)
- [Bylaws](#)

What Has ICANN Accomplished?

Here are just a few highlights of what our bottom-up, consensus-driven, multi-stakeholder model has produced:

- ICANN established market competition for generic domain name (gTLD) registrations resulting in a lowering of domain name costs by 80% and saving consumers and businesses over US\$1 billion annually in domain registration fees.
- ICANN implemented an efficient and cost-effective Uniform Domain Name Dispute Resolution Policy (UDRP), which has been used to resolve thousands of disputes over the rights to domain names.
- Working in coordination with the appropriate technical communities and stakeholders, ICANN adopted guidelines for the deployment of Internationalized Domain Names (IDN), opening the way for registration of domains in hundreds of the world's languages.
- Verisign, ICANN and NTIA jointly completed deployment of Domain Name System Security Extensions (DNSSEC) for the root zone in July 2010. These extensions make certain kinds of cyberfraud much more difficult to perpetrate. As of 30 June 2011, 70 TLDs had adopted DNSSEC, including two of the largest TLDs -- .com and .de.
- ICANN created the New gTLD Program, so that any established entity in the world can apply to operate its own top

-level domain. Many of these new gTLDs will go online in 2013.

- The world broadly accepts [ICANN](#) as the place to work out Internet governance policies. As 2011 ended, the Governmental Advisory Committee represented 109 nations (plus the European Union and the Vatican). The Country Code Names Supporting Organization ([ccNSO](#)) represented more than 120 country code domains. The At-Large Advisory Committee represented 134 At-Large Structures (ALSes) from all geographic regions.

[ICANN Welcomes Your Participation](#)

If you have an interest in global Internet policy related to [ICANN](#)'s mission of technical coordination, we encourage you to participate. [ICANN](#) provides many online forums through this website, and the Supporting Organizations and Advisory Committees have active mailing lists for participants. Additionally, [ICANN](#) holds [public meetings](#) throughout the year.

At any given time, many of the groups working on policy issues are seeking public input. You are always welcome to lend them your perspective, on the [Public Comment Forum](#).

For more information on the Supporting Organizations and Advisory Committees, please refer to their respective websites or pages:

- [Address Supporting Organization \(ASO\)](#)
- [At-Large Advisory Committee \(ALAC\)](#)
- [Country Code Domain Name Supporting Organization \(ccNSO\)](#)
- [Generic Names Supporting Organization \(GNSO\)](#)
- [Governmental Advisory Committee \(GAC\)](#)
- [Root Server System Advisory Committee \(RSSAC\)](#)
- [Security and Stability Advisory Committee \(SSAC\)](#)

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Domain Name System

Internationalized Domain Name ,IDN,"IDNs are domain names that include characters used in the local representation of languages that are not written with the twenty-six letters of the basic Latin alphabet ""a-z"". An IDN can contain Latin letters with diacritical marks, as required by many European languages, or may consist of characters from non-Latin scripts such as Arabic

or Chinese. Many languages also use other types of digits than the European "0-9". The basic Latin alphabet together with the European-Arabic digits are, for the purpose of domain names, termed "ASCII characters" (ASCII = American Standard Code for Information Interchange). These are also included in the broader range of "Unicode characters" that provides the basis for IDNs. The "hostname rule" requires that all domain names of the type under consideration here are stored in the DNS using only the ASCII characters listed above, with the one further addition of the hyphen "-". The Unicode form of an IDN therefore requires special encoding before it is entered into the DNS. The following terminology is used when distinguishing between these forms: A domain name consists of a series of "labels" (separated by "dots"). The ASCII form of an IDN label is termed an "A-label". All operations defined in the DNS protocol use A-labels exclusively. The Unicode form, which a user expects to be displayed, is termed a "U-label". The difference may be illustrated with the Hindi word for "test" — परीका — appearing here as a U-label would (in the Devanagari script). A special form of "ASCII compatible encoding" (abbreviated ACE) is applied to this to produce the corresponding A-label: xn--11b5bs1di. A domain name that only includes ASCII letters, digits, and hyphens is termed an "LDH label". Although the definitions of A-labels and LDH-labels overlap, a name consisting exclusively of LDH labels, such as "icann.org" is not an IDN."

Exhibit C

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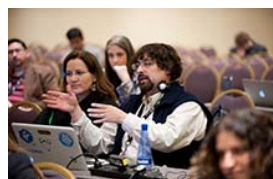
Take a course, connect with peers for support, or explore multimedia resources including guides, podcasts, videos, and webinars. Many resources are provided in multiple languages.

Resources by Department



ccTLDs

References useful to country code managers and operators, including: letters of agreement between each ccTLD and ICANN; documents related to ccTLDs from entities such as ICANN Board, Staff, IANA, and the GAC; the full text of ICP-1; and more.



Contractual Compliance

Every ICANN-accredited registrar and registry has a contract with ICANN. Here's where you can learn about all facets of ICANN's Contractual Compliance Program, which helps both ICANN and the contracted parties each fulfill their end of the agreement.



Internationalized Domain Names

You'll find the lengthy, detailed history of IDNs here, along with technical implementation guidelines, publications and presentations about IDNs, an IDN glossary, ICANN blog entries about IDN updates, and more.



Policy

Links here present background, updates, and announcements about important areas of Internet policy currently being addressed by the ICANN community's bottom-up, consensus based, policy development process.



Registrars

Information found here related to Registrars ranges widely, including a list of all accredited registrars, how to become a registrar, the registrar data escrow program, how dispute resolution works, and updates on domain-related policies.



Registries

Registry personnel can find a variety of helps here, such as: agreements, consensus policies, key ICANN contacts for registries, a list of valid top-level domains, a list of all accredited registries, and much more.

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Articles of Incorporation for [ICANN](#).

[Board Code of Conduct](#)

[ICANN](#)'s expected standards of ethical conduct for Board members and Liaisons. The Board has also developed [Code of Conduct Guidelines](#) on encouraging adherence to the Code of Conduct and how to address potential breaches of the Code.

[Board Conflicts of Interest Policy](#)

Policy to ensure that the deliberations and decisions of [ICANN](#) are made in the interest of the global Internet community.

[Board Governance Guidelines](#)

Board governance policies and practices.

[Board Meeting Transcripts, Minutes & Resolutions](#)

[ICANN](#) Board of Directors' meeting dates, notes and minutes.

[Board Statements of Interest](#)

Summary of Board Member and Board Liaison statements of interests disclosed pursuant to the Conflicts of Interest Policy.

[Bylaws and Bylaws Archives](#)

The bylaws outlining [ICANN](#)'s powers and responsibilities, and previous versions of the [ICANN](#) bylaws.

[ICANN Conflict of Interest Enforcement and Compliance Report \[PDF, 53 KB\]](#)

[Summary of Conflicts of Interest and Ethics Practices Review](#)

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Domain Name System

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Exhibit E

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ICANN's Major Agreements and Related Reports

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ICANN operates in large part by entering into agreements with various other parties involved in the operation of the Internet. These agreements fall generally into two categories: *Transition Agreements* and *Implementation Agreements*.

Transition Agreements

In its 5 June 1998 "Statement of Policy, Management of Internet Names and Addresses," 63 Fed. Reg. 31741(1998) (commonly known as the [White Paper](#)), the United States Government declared its willingness to recognize a new, not-for-profit corporation formed by private sector Internet stakeholders to administer policy for the Internet name and address system. The White Paper envisioned a transition process during which the not-for-profit corporation would enter various agreements to facilitate ending the United States Government's role in the Internet number and name address system in a manner that ensures the stability of the Internet. These agreements are as follows:

- **Memorandum of Understanding/Joint Project Agreement with U.S. Department of Commerce** (sometimes known as the "Joint Project Agreement").
 - [Memorandum of Understanding \(MOU\) Between ICANN and U.S. Department of Commerce](#) (25 November 1998)
 - [Amendment 1 to ICANN/DOC MOU](#) (10 November 1999)
 - [Amendment 2 to ICANN/DOC MOU](#) (7 September 2000)
 - [Amendment 3 to ICANN/DOC MOU](#) (25 May 2001)
 - [Amendment 4 to ICANN/DOC MOU](#) (24 September 2001)
 - [Amendment 5 to ICANN/DOC MOU](#) (19 September 2002)
 - [Amendment 6 to ICANN/DOC MOU](#) (17 September 2003)
 - [Modifications to JPA; Affirmation of Responsibilities for ICANN Private Sector Management](#) [PDF, 220 KB] (29 September 2006)

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ICANN has submitted thirteen **status reports** to the Department of Commerce under this memorandum of understanding:

- [Status Report to the U.S. Department of Commerce](#) (15 June 1999)
 - [Second Status Report to the Department of Commerce](#) (30 June 2000)
 - [Third Status Report to the Department of Commerce](#) (3 July 2001)
 - [Fourth Status Report to the Department of Commerce](#) (15 August 2002)
 - [Fifth Status Report to the Department of Commerce](#) (8 January 2003)
 - [Sixth Status Report to the Department of Commerce](#) (31 March 2003)
 - [Seventh Status Report to the Department of Commerce](#) (30 June 2003)
 - [Eighth Status Report to the Department of Commerce](#) (1 August 2003)
 - [Ninth Status Report to the Department of Commerce](#) (7 April 2004)
 - [Tenth Status Report to the Department of Commerce](#) (7 October 2004)
 - [Eleventh Status Report to the Department of Commerce](#) (7 April 2005)
 - [Twelfth Status Report to the Department of Commerce](#) (7 October 2005)
 - [Thirteenth Status Report to the Department of Commerce](#) (7 April 2006)
- **Agreement with the University of Southern California**
 - [Transition Agreement](#) (December 1998).
 - **IANA Function Contracts**
 - [ICANN/U.S. Government Contract for the IANA Function](#) (9 February 2000).
 - [Modification 0001 to ICANN/U.S. Government Contract for the IANA Function](#) (6 September 2000).
 - [ICANN/U.S. Government Contract for the IANA Function](#) (21 March 2001).
 - [ICANN/U.S. Government Contract for Performance of the IANA Function](#) (17 March 2003)
 - [Amendment/Modification to Extend the U.S./ICANN Contract for Performance of the IANA Function](#) (2 September 2003)
 - [Preliminary Notification of the Governments intent to Extend the Term of Contract No.: DG1335-03-SE-0336](#) (8 August 2003)
 - [ICANN/U.S. Government Contract for Performance of the IANA Function](#) (14 August 2006)
 - [Amendment/Modification to Extend Term of Contract](#) (14 June 2011)
 - [ICANN/U.S. Government Contract for the IANA Functions](#) [PDF, 857 KB] (effective 1 October 2012)
 - [ICANN Proposal](#) (incorporated by reference)
 - Volume I – Technical Proposal
 - [Volume I, Part 1 of 3](#) [PDF, 4.39 MB]
 - [Volume I, Part 2 of 3](#) [PDF, 2.33 MB]
 - [Volume 1, Part 3 of 3](#) [PDF, 3.9 MB]
 - [Volume II – Financial Information and Project Funding Strategy](#) [PDF, 2.98 MB]

ICANN responses to requests for additional information

- [June 23 correspondence](#) [PDF, 876 KB]
- [June 26 correspondence](#) [PDF, 237 KB]

[Modification No. 0001](#) [PDF, 165 KB] (effective 1 October 2012)

[Modification No. 0002](#) [PDF, 203 KB] (effective 30 April 2013)

• **Root-Nameserver Agreements**

- [Cooperative Research and Development Agreement \(CRADA\) with the United States Government](#).
 - [Amendment 1 to CRADA](#) (September 2000).
 - [Amendment 2 to CRADA](#) (28 September 2001).
 - [Public Summary of Reports Provided Under CRADA](#) (14 March 2003).

• **InterNIC Agreement®**

- [License Agreement Concerning InterNIC®](#) (8 January 2001).
- [Amendment to License Agreement Concerning InterNIC®](#) (29 September 2009).

Implementation Agreements

Policies adopted through the ICANN process are implemented by agreement of entities involved in the operation of the Internet. In some cases, this agreement occurs after the policy is adopted; in other cases the implementation is pre-arranged through written agreements. Some of those agreements are:

- [IETF/ICANN Memorandum of Understanding Concerning the Technical Work of the IANA](#) (1 March 2000). Under this memorandum, the Internet Engineering Task Force (IETF) has appointed ICANN to perform a set of functions (known as the "IANA functions") involving assignment of protocol parameters used in IETF standards.

Note: The documents listed below supplement the 1 March 2000 IETF/ICANN Memorandum of Understanding concerning the Technical Work of the IANA.

- [ICANN/IANA – IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2007).
- [ICANN/IANA– IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2008) [PDF, 308 KB]
- [ICANN/IANA – IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2009) [PDF, 307 KB]
- [ICANN/IANA – IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2010) [PDF, 248 KB]
- [ICANN/IANA – IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2011) [PDF, 115 KB]
- [ICANN/IANA – IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2012) [PDF, 487 KB]
- [ICANN/IANA – IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2013) [PDF, 619 KB]
- [ICANN/IANA – IETF Memorandum of Understanding Supplement Agreement](#) (effective 1 January 2014) [PDF, 1.25 MB]

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**Glossary: Internet Corporation for Assigned Names and Numbers**

The Internet Corporation for Assigned Names and Numbers (ICANN) is an internationally organized, non-profit corporation that has responsibility for Internet Protocol (IP) address space allocation, protocol identifier assignment, generic (gTLD) and country code (ccTLD) Top-Level Domain name system management, and root server system management functions. Originally, the Internet Assigned Numbers Authority (IANA) and other entities performed these services under U.S. Government contract. ICANN now performs the IANA function.

Exhibit F

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Five Year
Strategic
Plan -
Process

Five Year
Strategic

Strategic Planning


[ICANN Strategic Plan for fiscal years 2016 - 2020](#)

ICANN is in the final phase of creating a new, long-term Strategic Plan through an extensive, collaborative, bottom-up, multistakeholder and multilingual process. On 16 October 2014, at the [ICANN51 meeting](#) in Los Angeles, the [ICANN Board](#) is [scheduled](#) to take action on the final draft of a [Strategic Plan](#) for fiscal years 2016 - 2020.



A new Strategic Plan provides an opportunity for the global community to coalesce around a new overarching vision and long-term objectives. The final draft Strategic Plan pending for Board action: articulates [ICANN's](#) new **Vision**; restates [ICANN's](#) **founding Mission**; and sets forth five **Strategic Objectives** and sixteen **Strategic Goals**, each with Key Success Factors (Outcomes), and Strategic Risks.

Proposed **VISION**: [ICANN's](#) vision is that of an independent, global organization trusted worldwide to coordinate the global Internet's systems of unique identifiers to support a single, open globally interoperable Internet. [ICANN](#) builds trust through serving the public interest, and incorporating the transparent and effective

Plan - Framework	<i>cooperation among stakeholders worldwide to facilitate its coordination role.</i>	
Presentations	STRATEGIC OBJECTIVES:	
RFPs		
Litigation		• <i>Evolve and further globalize <u>ICANN</u></i>
Newsletter		• <i>Support a healthy, stable, and resilient unique identifier ecosystem</i>
Correspondence		• <i>Advance organizational, technological and operational excellence</i>
Groups	• <i>Promote <u>ICANN's</u> role and multistakeholder approach</i>	
Contractual Compliance	• <i>Develop and implement a global public interest framework bounded by</i>	
Registrars	• <i><u>ICANN's</u> mission.</i>	
Registries		
ccTLDs		
Internationalized Domain Names	Read the entire draft Strategic Plan online .	
Universal Acceptance Initiative	How we got here	
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The final draft Strategic Plan for FY16-FY20 is the result of an extensive, collaborative, bottom-up,

multistakeholder, multilingual process that began in [April 2013](#) online and at the ICANN meeting in Beijing. ICANN has sought extensive [public input](#) on its [key challenges and opportunities](#) and on the [eight strategic areas](#) highlighted by ICANN's Board. Work and input on related initiatives, such as the Security, Stability & Resiliency Framework, and the Regional Engagement Strategies, have also informed the Strategic Plan, along with the [Strategy](#)

[Panels'](#) advice and, of course, [public comments](#) received on the Draft Strategic Plan.

Planning Framework

To provide the public with more insight and advance ICANN's accountability and transparency, a **draft Five-Year Operating Plan** is being developed to compliment the Strategic Plan. A new element of ICANN's planning framework, the Five-Year Operating Plan will detail — for each Strategic Objective and Goal—portfolios of ICANN activities, key operational success factors (outcomes), risks, key performance indicators (measurements), key dependencies, and phasing over five years (through FY2020).

The **Strategic Plan** and **Five-Year Operating Plan** will provide the foundation for ICANN's annual operating plans and budgets. Along with these new plans, a new planning framework will be developed with the community to identify when and how the plans will be reviewed with the community and updated going forward. A public session on "[Strategic and Operating Planning](#)" scheduled for Wednesday, 15 October will provide more information and an opportunity to discuss these issues.

Supporting Materials

- **April – June 2014** Public Comment Period on ICANN Draft 5-Year Strategic Plan (FY 16 – FY 20) – Public Comments on ICANN's Draft 5-Year Strategic Plan (FY16-20). [Review the results of this now-closed comment period.](#)
- **October 2013 – January 2014** – [Public comments \(now closed\) on the Draft Vision, Mission and Focus Areas](#) for ICANN's Five-Year Strategic Plan.
- **November 2013** – Community discussion and feedback at ICANN 48 in Buenos Aires, Argentina on the posted Draft Vision, Mission and Focus Areas for ICANN's Five-Year Strategic Plan. Listen to the audio files from [Introduction to Strategy Panels Session](#) or the [Strategic Planning Session](#).

- **July – September 2013** – Public comments on [ICANN's](#) key challenges and opportunities, as well as its eight strategic areas (below) as highlighted by the [ICANN](#) Board of Directors. [Review the results of this now-closed comment period.](#)
Summary of these Comments listed below by strategic area:

1. [Summary of Comments on Role Clarity](#) [PDF, 84 KB]
2. [Summary of Comments on \[ICANN\]\(#\) Community](#) [PDF, 92 KB]
3. [Summary of Comments on Users](#) [PDF, 56 KB]
4. [Summary of Comments on Internationalization & Regional Development](#) [PDF, 86 KB]
5. [Summary of Comments on Internet Governance](#) [PDF, 90 KB]
6. [Summary of Comments on Security & Stability](#) [PDF, 62 KB]
7. [Summary of Comments on Operational Excellence](#) [PDF, 68 KB]
8. [Summary of Comments on \[Domain Name\]\(#\) Industry Engagement](#) [PDF, 70 KB]

- **July 2013** – Community discussion and input at [ICANN 47](#) in Durban, South Africa on the challenges and opportunities put forth by the Board of Directors. Summary of comments are below from the [ICANN Durban Meeting Strategic Planning Session Agenda](#) [PDF, 1.23 MB]
- **April – June 2013** – Strategy initiative announced at [ICANN 46](#) in Beijing, China with the [community invited to participate in the process](#). Staff, Board & Community brainstorming collected to kickoff the process. A [synthesis of the brainstorming discussions & online input](#) [PDF, 209 KB].

Important Links and Information

- [ICANN Draft 5-Year Strategic Plan \(FY 16 – FY 20\)](#)

- [ICANN Draft 5-Year Strategic Plan \(FY 16 – FY 20\) Initial Report of Public Comments](#)
- [ICANN's current Strategic Plan \[PDF, 864 KB\]](#)
- [ICANN Bylaws – Mission and Core Values](#)
- [ICANN's FY14 Security, Stability & Resiliency Framework \[PDF, 5.93 MB\]](#)
- [ICANN Strategy Panels](#)

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Exhibit G

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[Model MOU](#)

ICP-1: Internet Domain Name System Structure and Delegation (ccTLD Administration and Delegation)

IMPORTANT NOTICE. The following Internet Coordination Policy is being posted for the information of the Internet community. It contains a statement of the current policies being followed by the Internet Assigned Numbers Authority (IANA) in administering delegations of Top Level Domain Names of the Internet Domain Names System (DNS). At a future date, the ICANN Board may consider changes to these policies and will, at such time, notice proposed changes for public comment in accordance with the ICANN Bylaws.

Comments on this document are welcome and should be directed to comments@icann.org.

INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS

INTERNET ASSIGNED NUMBERS AUTHORITY

Internet Domain Name System Structure and Delegation (ccTLD Administration and Delegation)

(May 1999)

Abstract

Workshops	<p>This document is a summary of current practices of the Internet Assigned Numbers Authority (IANA) in administering RFC 1591, which includes the guidance contained in ccTLD News Memo #1 dated October 23, 1997. It DOES NOT reflect any changes in policy affecting the administration of DNS delegations. It is intended to serve as the basis for possible future discussions of policy in this area. Changes in ICANN/IANA policy will be made following public notice and comment in accordance with the ICANN Bylaws.</p> <h3>Introduction</h3> <p>The IANA is the overall authority for day-to-day administration of the Internet Domain Name System (DNS). IANA staff carry out administrative responsibilities for the assignment of IP Addresses, Autonomous System Numbers, Top Level Domains (TLDs), and other unique parameters of the DNS and its protocols. This document provides general information on IANA policy for administering the DNS. Instructions on procedures to be followed in requesting TLD delegations or changes are available on the website at iana.org.</p>
ICANN and ISO	
Internationalized Domain Names	
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Top Level Structure of the [DNS](#)

The [DNS](#) structure contains a hierarchy of names. The root, or highest level, of the system is unnamed. Top Level Domains (TLDs) are divided into classes based on rules that have evolved over time. Most TLDs have been delegated to individual country managers, whose codes are assigned from a table known as [ISO-3166-1](#), which is maintained by an agency of the United Nations. These are called country-code Top Level Domains, or ccTLDs. In addition, there are a limited number of "generic" Top Level Domains (gTLDs), which do not have a geographic or country designation. Responsibility for adoption of procedures and policies for the assignment of Second Level Domain Names (SLDs), and lower level hierarchies of names, has been delegated to [TLD](#) managers, subject to the policy guidance contained in this document. Country code domains are each organized by a manager for that country. These managers are performing a public service on behalf of the Internet community. A list of current [TLD](#) assignments and names of the delegated managers can be accessed at <http://www.iana.org/domains/root/>.

The Management of Delegated Domains

As part of its responsibility for the overall coordination and management of the DNS, the IANA receives and processes all requests for new TLDs and for changes to existing TLDs. The following policies are applicable to management of TLDs. In general, the principles described here apply recursively to all delegations of the Internet DNS name space.

(a) Delegation of a New Top Level Domain. Delegation of a new top level domain requires the completion of a number of procedures, including the identification of a TLD manager with the requisite skills and authority to operate the TLD appropriately. The desires of the government of a country with regard to delegation of a ccTLD are taken very seriously. The IANA will make them a major consideration in any TLD delegation/transfer discussions. Significantly interested parties in the domain should agree that the proposed TLD manager is the appropriate party. The key requirement is that for each domain there be a designated manager for supervising that domain's name space. In the case of ccTLDs, this means that there is a manager that supervises the domain names and operates the domain name system in that country. There must be Internet Protocol (IP) connectivity to the nameservers and electronic mail connectivity to the entire management, staff, and contacts of the manager. There must be an administrative contact and a technical contact for each domain. The administrative contact must reside in the country involved for ccTLDs. The IANA may choose to make partial delegations of a TLD when circumstances, such as those in a developing country, so dictate. It may also authorize a "proxy" DNS service outside of a developing country as a temporary form of assistance to the creation of Internet connectivity in new areas. [N.B. The IANA continues to receive inquiries about delegation of new gTLDs. This is a significant policy issue on which ICANN will conduct a careful study and review based on the established decision making procedures. Information about this study will be disseminated on the website at icann.org.]

(b) TLD Manager Responsibility. TLD managers are trustees for the delegated domain, and have a duty to serve the community. The designated manager is the trustee of the TLD for both the nation, in

the case of ccTLDs, and the global Internet community. Concerns about "rights" and "ownership" of domains are inappropriate. It is appropriate, however, to be concerned about "responsibilities" and "service" to the community.

(c) Fair Treatment. The designated manager must be equitable and fair to all groups in the domain that request domain names. Specifically, the same rules must be applied to all requests and they must be processed in a non-discriminatory fashion. The policies and procedures for the use of each TLD must be available for public inspection. Generally these are posted on web pages or made available for file transfer. While variations in policies and procedures from country to country are expected due to local customs and cultural values, they must be documented and available to interested parties. Requests from for-profit and non-profit companies and organizations are to be treated on an equal basis. No bias shall be shown regarding requests that may come from customers of some other business related to the TLD manager. For example, no preferential service for customers of a particular data network provider. There can be no stipulation that a particular application, protocol, or product be used.

(d) Operational Capability. The TLD manager must do a satisfactory job of operating the DNS service for the domain. Duties such as the assignment of domain names, delegation of subdomains and operation of nameservers must be done with technical competence. This includes keeping the IANA or other higher-level domain manager advised of the status of the domain, responding to requests in a timely manner, and operating the database with accuracy, robustness, and resilience. Because of its responsibilities for the DNS, the IANA must be granted access to all TLD zones on a continuing basis. There must be a primary and a secondary nameserver that have IP connectivity to the Internet and can be easily checked via access to zones for operational status and database accuracy by the IANA.

(e) Transfers and Disputes over Delegations. For transfer of TLD management from one organization to another, the higher-level domain manager (the IANA in the case of TLDs), must receive communications from both the old organization and the new organization that assure the IANA that the transfer is mutually

agreed, and that the proposed new manager understands its responsibilities. It is also very helpful for the IANA to receive communications from other parties that may be concerned or affected by the transfer. In the event of a conflict over designation of a TLD manager, the IANA tries to have conflicting parties reach agreement among themselves and generally takes no action unless all contending parties agree. On a few occasions, the parties involved in proposed delegations or transfers have not been able to reach an agreement and the IANA has been required to resolve the matter. This is usually a long drawn out process, leaving at least one party unhappy, so it is far better when the parties can reach an agreement among themselves. It is appropriate for interested parties to have a voice in the selection of the designated manager.

(f) Revocation of TLD Delegation. In cases where there is misconduct, or violation of the policies set forth in this document and RFC 1591, or persistent, recurring problems with the proper operation of a domain, the IANA reserves the right to revoke and to redelegate a Top Level Domain to another manager.

(g) Subdelegations of Top Level Domains. There are no requirements for management of subdomains of TLDs, including subdelegations, beyond the requirements for TLDs stated in this document and RFC 1591. In particular, all subdomains shall be allowed to operate their own domain nameservers, providing in them whatever information the subdomain manager sees fit, as long as it is true and correct.

(h) Rights to Domain Names. The IANA has no special requirement for policies to be followed by TLD managers in connection with disputes over rights to domain names other than those stated generally in this document and RFC 1591. Please note, however, that use of a particular domain name may be subject to applicable laws, including those concerning trademarks and other types of intellectual property.

(i) Uses of ISO 3166-1 Table. The IANA is not in the business of deciding what is and what is not a country. The selection of the ISO-3166-1 list as a basis for country code top-level domain names was made with the knowledge that ISO has a procedure for determining which entities should be and should not be on that list.

For more information about the [ISO 3166 Maintenance Agency](http://www.iso.org/iso/en/prods-services/iso3166ma/index.html), please see the following webpage: <http://www.iso.org/iso/en/prods-services/iso3166ma/index.html>.

(j) Maintenance Procedure for [Root Zone File](#). The primary root zone file is currently located on the A root server, which is operated by Network Solutions, Inc. (NSI), under a cooperative agreement with the U.S. Government. Changes to the root zone file are made by NSI according to procedures established under Amendment 11 of that cooperative agreement.

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Domain Name System

Internationalized Domain Name (IDN), IDNs are domain names that include characters used in the local representation of languages that are not written with the twenty-six letters of the basic Latin alphabet "a-z". An IDN can contain Latin letters with diacritical marks, as required by many European languages, or may consist of characters from non-Latin scripts such as Arabic or Chinese. Many languages also use other types of digits than the European "0-9". The basic Latin alphabet together with the European-Arabic digits are, for the purpose of domain names, termed "ASCII characters" (ASCII = American Standard Code for Information Interchange). These are also included in the broader range of "Unicode characters" that provides the basis for IDNs. The "hostname rule" requires that all domain names of the type under consideration here are stored in the DNS using only the ASCII characters listed above, with the one further addition of the hyphen "-". The Unicode form of an IDN therefore requires special encoding before it is entered into the DNS. The following terminology is used when distinguishing between these forms: A domain name consists of a series of "labels" (separated by "dots"). The ASCII form of an IDN label is termed an "A-label". All operations defined in the DNS protocol use A-labels exclusively. The Unicode form, which a user expects to be displayed, is termed a "U-label". The difference may be illustrated with the Hindi word for "test" — परीका — appearing here as a U-label would (in the Devanagari script). A special form of "ASCII compatible encoding" (abbreviated ACE) is applied to this to produce the corresponding A-label: xn--11b5bs1di. A domain name that only includes ASCII letters, digits, and hyphens is termed an "LDH label". Although the definitions of A-labels and LDH-labels overlap, a name consisting exclusively of LDH labels, such as "icann.org" is not an IDN."

Exhibit H

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Resources for Country Code Managers

Note: Registrations of domain names within two-letter country-code top-level domains (ccTLDs) such as .au, .ca, .jp., and .uk are administered by country-code managers. If you want information about registration requirements in a particular ccTLD, please see the [IANA ccTLD database](#) to identify the manager.

ICANN is the global forum for developing policies for coordination of some of the Internet's core technical elements, including the domain-name system (DNS). ICANN operates on the basis of consensus, with affected stakeholders coming together to formulate coordination policies for the Internet's core technical elements in the public interest. The policies are then implemented by the agreement of the operators of the core elements, including gTLD registry operators and sponsors, ccTLD managers, regional Internet (IP address) registries, and root-nameserver operators.

Traditionally, the agreement to implement coordinated policies for the Internet has been informal. As the Internet has spread throughout the world and grown in commercial importance, however, operators and users of the Internet have concluded that a more formal set of written agreements should be established. One of ICANN's activities is to work with the other organizations involved in the Internet's technical coordination to formally document their participatory role within the ICANN process and their commitments to implement the policies that result. These have included agreements with [Network Solutions](#) (now VeriSign), which operates the .com and .net top-level domains; the companies responsible for operating the new, "unsponsored" TLDs (.biz, .info, and .name); the organizations sponsoring the "sponsored" TLDs (.aero, .coop, and .museum); [Public Interest Registry](#), which operates the .org top-level domains; and over 150 [ICANN-accredited registrars](#); the [regional Internet registries](#); and the [Internet Engineering Task Force](#).

Since 2000, ICANN has also been working with managers of ccTLDs (the two-letter TLDs that have been established for countries and some territories) to document their relationship with ICANN. These relationships are more complex, because of the varying circumstances (in terms of type of organization, policies followed, economics, language, culture, legal environment, and relations with governments) of different ccTLDs and the organizations that operate them. An additional factor to be addressed is the role, recognized in the June 1998 U.S. Government White Paper, that national governments have in "manag[ing] or establish[ing] policy for their own ccTLDs."

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Glossary: Intellectual Property; or Internet Protocol

Exhibit I

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[ICANN Board/Staff Materials](#)

- [Topic Paper at Cairo Meeting on "ccTLD Delegation and Administration Policies"](#) (1 March 2000)
- [ICANN Board Resolution 00.13](#) (10 March 2000)
- [Topic Paper at Yokohama Meeting on "ccTLD Delegation and Administration Policies"](#) (5 July 2000)
- [Discussion Draft of ccTLD Manager-ICANN "Status Quo" Agreement](#) (5 July 2000)
- [ICANN Board Resolutions 00.74 and 00.75](#) (25 September 2000)
- [Discussion Draft of Letter to Governments Regarding ccTLD Managers](#) (12 November 2000)
- [ICANN Board Resolution 01.37](#) (13 March 2001)
- [Topic Paper at Montevideo Meeting on "Update on ccTLD Agreements"](#) (2 September 2001)
- [Presentation at Montevideo Meeting: Update on ccTLD Agreements](#) (9 September 2001)
- [ICANN Board Resolutions 01.87 and 01.88](#) (10 September 2001)
- Materials Presented at 3-4 March 2003 ccTLD Workshop:
 - [Administering the Root: Delegations and Redelegations — Every Country is Unique](#)

Internationalized Domain Names	<ul style="list-style-type: none">• ICANN and the Global Internet• ICANN and Reform
Universal Acceptance Initiative	<u>IANA Documents</u>
Policy	<ul style="list-style-type: none">• IANA ccTLD Database (shows currently recognized ccTLD managers)
Public Comment	<ul style="list-style-type: none">• List of IANA Reports Concerning ccTLDs (descriptions of major delegation and redelegation decisions)
Contact	<ul style="list-style-type: none">• RFC 1591 (description of Domain Name System Structure and Delegation, March 1994)
Help	<ul style="list-style-type: none">• ICP-1: Internet Domain Name System Structure and Delegation (ccTLD Administration and Delegation) (May 1999)• ccTLD Redelegation Step-by-Step Overview (19 June 2002)• Procedures for Handling Requests by ccTLD Managers to Change Nameservers (19 March 2003).
	<u>GAC Documents</u>
	<ul style="list-style-type: none">• Principles and Guidelines for the Delegation and Administration of Country Code Top Level Domains [RTF, 56K] (5 April 2005)• Paper on Principles for Administration and Delegation of ccTLDs (presented at 3-4 March 2003 ccTLD Workshop)• Summary of GAC Statements Concerning ccTLDs
	<u>CENTR Documents</u>
	<ul style="list-style-type: none">• 7th Draft Contract for Services (20 September 2000)• Best Practice Guidelines for ccTLD Managers, Second Version (adopted 20 May 2001)
	<u>ccTLD Constituency Documents</u>
	<ul style="list-style-type: none">• ccTLD Constituency 8th Draft Contract for Services (14 November 2000)• ccTLD Constituency 4th Draft Best Practices Guidelines for ccTLD Managers (10 March 2001)

Other ICANN Group Documents

- [GNSO resolution on ITU Workshop on Member States' experiences with ccTLD](#) (presented at 3-4 March 2003 ccTLD Workshop)

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Glossary: Country Code Top Level Domain

Two letter domains, such as .uk (United Kingdom), .de (Germany) and .jp (Japan) (for example), are called country code top level domains (ccTLDs) and correspond to a country, territory, or other geographic location. The rules and policies for registering domain names in the ccTLDs vary significantly and ccTLD registries limit use of the ccTLD to citizens of the corresponding country.

Exhibit J

CIVIL ACTION NOS. 00-2602-RCL; 00-2601-RCL; 01-1655-RCL;
02-1811-RCL; 08-520-RCL; 14-648-RCL; 08-502-RCL

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ccTLD Agreements

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- [.me – Montenegro - ICANN Exchange of Letters](#) (13 May 2013)
- [.cw – Curacao – ICANN Accountability Framework](#) (12 March 2012)
- [.kg – Asiainfo Telecommunication Enterprise – ICANN Exchange of Letters](#) (5 June 2012)
- [.fr – Afnic – ICANN Exchange of Letters](#) (26 October 2011)
- [.ae, .emirate, امارات – United Arab Emirates – ICANN Exchange of Letters](#) (10 October 2011)
- [.ms – Montserrat – ICANN Accountability Framework](#) (17 March 2011)
- [.lu – Luxemburg – ICANN Exchange of Letters](#) (22 February 2011)
- [.an – Netherlands Antilles – ICANN Accountability Framework](#) (23 June 2010)
- [.ec – Ecuador – ICANN Accountability Framework](#) (23 June 2010)
- [.ge – Georgia – ICANN Exchange of Letters](#) (22 March 2010)
- [.pg – Papua New Guinea – ICANN Exchange of Letters](#) (10 March 2010)
- [.sg – Singapore – ICANN Exchange of Letters](#) (28 October 2009)
- [.ua – Ukraine – ICANN Exchange of Letters](#) (2 September 2009)
- [.pt – Portugal – ICANN Exchange of Letters](#) (25 June 2009)
- [.py – Paraguay – ICANN Accountability Framework](#) (24 June 2009)
- [.mx – Mexico – ICANN Accountability Framework](#) (22 June 2009)
- [.vu – Vanuatu – ICANN Exchange of Letters](#) (25 May 2009)
- [.uy – Uruguay – ICANN Exchange of Letters](#) (24 June 2009)
- [.ht – Haiti – ICANN Accountability Framework](#) (24 June 2009)

Public Comment
Contact
Help

- [.tj – Tajikistan – ICANN Exchange of Letters](#) (6 May 2009)
- [.at – Austria – ICANN Exchange of Letters](#) (2 March 2009)
- [.aw – Aruba – ICANN Accountability Framework](#) (2 March 2009)
- [.bo – Bolivia – ICANN Accountability Framework](#) (2 March 2009)
- [.kr – Republic of Korea – ICANN Exchange of Letters](#) (2 March 2009)
- [.eg – Egypt – ICANN Exchange of Letters](#) (2 November 2008)
- [.cc – Cocos \(Keeling\) Islands-ICANN Exchange of Letters](#) (22 September 2008)
- [.pl – Poland-ICANN Exchange of Letters](#) (5 September 2008)
- [.th – Thailand-ICANN Exchange of Letters](#) (15 July 2008)
- [.cr – Costa Rica-ICANN Accountability Framework](#) (25 June 2008)
- [.is – Iceland-ICANN Exchange of Letters](#) (6 May 2008)
- [.za – South Africa-ICANN Exchange of Letters](#) (6 March 2008)
- [.az – Azerbaijan-ICANN Accountability Framework](#) (6 March 2008)
- [.nu – Niue-ICANN Accountability Framework](#) (16 January 2008)
- [.it – Italy-ICANN Exchange of Letters](#) (31 October 2007)
- [.sb – Solomon Islands-ICANN Exchange of Letters](#) (30 October 2007)
- [.nz – New Zealand-ICANN Exchange of Letters](#) (29 October 2007)
- [.rs – Serbia-ICANN Exchange of Letters](#) (29 October 2007)
- [.fm – Micronesia-ICANN Exchange of Letters](#) (24 October 2007)
- [.ck – Cook Islands-ICANN Exchange of Letters](#) (2 October 2007)
- [.se – Sweden-ICANN Exchange of Letters](#) (18 September 2007)
- [.nl – Netherlands-ICANN Accountability Framework](#) (28 June 2007)
- [.fj – Fiji-ICANN Accountability Framework](#) (26 June 2007)
- [.pr – Puerto Rico-ICANN Accountability Framework](#) (26 June 2007)
- [.sv – El Salvador-ICANN Accountability Framework](#) (4 June 2007)
- [.mn – Mongolia-ICANN Accountability Framework](#) (30 May 2007)
- [.br – Brazil-ICANN Exchange of Letters](#) (10 May 2007)
- [.sn – Senegal-ICANN Exchange of Letters](#) (30 April 2007)
- [.am – Armenia-ICANN Exchange of Letters](#) (12 April 2007)
- [.ru – Russian Federation-ICANN Exchange of Letters](#) (25 March 2007)
- [.ci – Côte d'Ivoire-ICANN Exchange of Letters](#) (25 March 2007)

- [.ly – Libya-ICANN Exchange of Letters](#) (27 February 2007)
- [.be – Belgium-ICANN Exchange of Letters](#) (21 December 2006)
- [.fi – Finland-ICANN Exchange of Letters](#) (4 December 2006)
- [.pa – Panama-ICANN Accountability Framework \(Spanish\)](#) (4 December 2006)
- [.cz – Czech Republic-ICANN Accountability Framework](#) (29 November 2006)
- [.kz – Kazakhstan-ICANN Accountability Framework](#) (29 November 2006)
- [.ni – Nicaragua-ICANN Accountability Framework](#) (28 September 2006)
- [.gt – Guatemala-ICANN Accountability Framework](#) (5 September 2006)
- [.pe – Peru-ICANN Accountability Framework](#) (14 August 2006)
- [.hu – Hungary-ICANN Exchange of Letters](#) (10 August 2006)
- [.hn – Honduras-ICANN Accountability Framework](#) (20 July 2006)
- [.no – Norway-ICANN Exchange of Letters](#) (17 July 2006)
- [.cl – Chile-ICANN Accountability Framework](#) (24 June 2006)
- [.na – Namibia-ICANN Exchange of Letters: \[ICANN-to-Namibia\]\(#\) \(19 June 2006\); \[Namibia-to-ICANN\]\(#\) \(10 March 2011\)](#)
- [.cx – Christmas Island-ICANN Accountability Framework](#) (16 June 2006)
- [.nf – Norfolk Island-ICANN Accountability Framework](#) (16 June 2006)
- [.lv – Latvia-ICANN Exchange of Letters](#) (19 May 2006)
- [.uk – United Kingdom-ICANN Exchange of Letters](#) (2 May 2006)
- [.de – Germany-ICANN Exchange of Letters](#) (22 March 2006)

[.au ccTLD Sponsorship Agreement](#)

- [Manager-Government Communication](#) (31 December 2000)
- [Government-ICANN Communication #1](#) (4 July 2001)
- [Government-ICANN Communication #2](#) (16 August 2001)
- [Proposed .au ccTLD Sponsorship Agreement](#) (4 September 2001)
- [Final .au ccTLD Sponsorship Agreement](#) (25 October 2001)

[.eu ccTLD Registry Agreement](#)

- [.eu ccTLD Registry Agreement](#) (23 June 2005)

[.jp ccTLD Sponsorship Agreement](#)

- [Manager-Government Communication](#) (9 November 2001)

- [Request for Redelelegation](#) (3 December 2001)
- [Inquiry to Present Manager and Government](#) (25 December 2001)
- [Response of Present Manager](#) (28 January 2002)
- [Government-ICANN Communication](#) (30 January 2002)
- [Proposed .jp ccTLD Sponsorship Agreement](#) (9 February 2002)
- [Final .jp ccTLD Sponsorship Agreement](#) (27 February 2002)

.ke ccTLD Sponsorship Agreement

- [Letter from Communications Commission of Kenya to Ministry of Transport and Communications](#) (21 June 2002)
- [Manager-ICANN Communication #1](#) (9 June 2002)
- [Government-ICANN Communication #1](#) (5 August 2002)
- [Government-ICANN Communication #2](#) (18 October 2002)
- [.ke ccTLD Sponsorship Agreement](#) (20 December 2002)

.ky ccTLD Sponsorship Agreement

- [.ky ccTLD Sponsorship Agreement](#) (7 June 2003)

.pw ccTLD Sponsorship Agreement

- [.pw ccTLD Sponsorship Agreement](#) (20 June 2003)

.sd ccTLD Sponsorship Agreement

- [Government-Manager Communication](#) (23 March 2002)
- [Clause 9 Analysis](#) (9 October 2002) (prepared by Manager)
- [Government-ICANN Communication](#) (15 October 2002)
- [Manager's Initial Policies](#) (15 October 2002)
- [ccTLD Sponsorship Agreement](#) (20 December 2002)

.tw ccTLD Sponsorship Agreement

- [Communication from Manager to DGT](#) (4 April 2002)
- [Communication from DGT to Manager](#) (14 May 2002)
- [Communication from DGT to ICANN](#) (11 March 2003)
- [Communication from Manager to ICANN](#) (11 March 2003)
- [ccTLD Sponsorship Agreement](#) (26 March 2003)

.uz ccTLD Sponsorship Agreement

- [Agreement between Uzinfocom and the Government of Uzbekistan](#) (18 October 2002)
- [Government to ICANN Communication](#) (22 October 2002)
- [Letter from Uzinfocom to ICANN](#) (19 November 2002)
- [ccTLD Sponsorship Agreement](#) (27 March 2003)

ICANN-ccTLD Manager MoUs

- [.ps – Palestinian Territory, Occupied](#) (17 June 2004)
- [.ng – Nigeria](#) (9 June 2004)
- [.md – Moldova](#) (2 December 2003)
- [.af – Afghanistan](#) (8 January 2003)
- [.bi – Burundi](#) (16 May 2002)
- [.la – Lao People's Democratic Republic](#) (20 December 2002)
- [.mw – Malawi](#) (28 June 2002)

Archived ccTLD Agreements

- [.na – Namibia-ICANN Exchange of Letters: Archived letter from Namibia-to-ICANN](#) (17 June 2006)

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Exhibit K

CIVIL ACTION NOS. 00-2602-RCL; 00-2601-RCL; 01-1655-RCL;
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Internet Assigned Numbers Authority

Root Zone Database

The Root Zone Database represents the delegation details of top-level domains, including gTLDs such as .com, and country-code TLDs such as .uk. As the manager of the DNS root zone, IANA is responsible for coordinating these delegations in accordance with its [policies and procedures](#).

Much of this data is also available via the WHOIS protocol at whois.iana.org.

Domain	Type	Sponsoring Organisation
.ac	country-code	Network Information Center (AC Domain Registry) c/o Cable and Wireless (Ascension Island)
.academy	generic	Half Oaks, LLC
.accountants	generic	Knob Town, LLC
.active	generic	The Active Network, Inc
.actor	generic	United TLD Holdco Ltd.
.ad	country-code	Andorra Telecom
.ae	country-code	Telecommunication Regulatory Authority (TRA)
.aero	sponsored	Societe Internationale de Telecommunications Aeronautique (SITA INC USA)
.af	country-code	Ministry of Communications and IT
.ag	country-code	UHSA School of Medicine
.agency	generic	Steel Falls, LLC
.ai	country-code	Government of Anguilla
.airforce	generic	United TLD Holdco Ltd.
.al	country-code	Electronic and Postal Communications Authority - AKEP
.alifinanz	generic	Allfinanz Deutsche Vermögensberatung Aktiengesellschaft
.alsace	generic	REGION D ALSACE
.am	country-code	Internet Society
.an	country-code	University of Curacao
.ao	country-code	Faculdade de Engenharia da Universidade Agostinho Neto
.aq	country-code	Antarctica Network Information Centre Limited
.ar	country-code	Presidencia de la Nación – Secretaría Legal y Técnica
.archi	generic	STARTING DOT LIMITED
.army	generic	United TLD Holdco Ltd.
.arpa	infrastructure	Internet Architecture Board (IAB)
.as	country-code	AS Domain Registry
.asia	sponsored	DotAsia Organisation Ltd.
.associates	generic	Baxter Hill, LLC
.at	country-code	nic.at GmbH
.attorney	generic	United TLD Holdco, Ltd
.au	country-code	.au Domain Administration (auDA)
.auction	generic	United TLD HoldCo, Ltd.
.audio	generic	Uniregistry, Corp.
.autos	generic	DERAutos, LLC
.aw	country-code	SETAR
.ax	country-code	Ålands landskapsregering
.axa	generic	AXA SA
.az	country-code	IntraNS
.ba	country-code	Universtiy Telinformatic Centre (UTIC)
.bar	generic	Punto 2012 Sociedad Anonima Promotora de Inversion de Capital Variable
.bargains	generic	Half Hallow, LLC
.bayern	generic	Bayern Connect GmbH
.bb	country-code	Government of Barbados Ministry of Economic Affairs and Development Telecommunications Unit
.bd	country-code	Ministry of Post & Telecommunications Bangladesh Secretariat
.be	country-code	DNS Belgium vzw/asbl
.beer	generic	Top Level Domain Holdings Limited
.berlin	generic	dotBERLIN GmbH & Co. KG
.best	generic	BestTLD Pty Ltd
.bf	country-code	ARCE-Autorité de Régulation des Communications Electroniques
.bg	country-code	Register.BG
.bh	country-code	Telecommunications Regulatory Authority (TRA)
.bi	country-code	Centre National de l'Informatique
.bid	generic	dot Bid Limited
.bike	generic	Grand Hollow, LLC
.bio	generic	STARTING DOT LIMITED
.biz	generic-restricted	NeuStar, Inc.
.bj	country-code	Benin Telecoms S.A.
.bl	country-code	Not assigned
.black	generic	Afilias Limited
.blackfriday	generic	Uniregistry, Corp.
.blue	generic	Afilias Limited
.bm	country-code	Registry General Ministry of Labour and Immigration

Domain	Type	Sponsoring Organisation
.bmw	generic	Bayerische Motoren Werke Aktiengesellschaft
.bn	country-code	Telekom Brunei Berhad
.bnpparibas	generic	BNP Paribas
.bo	country-code	Agencia para el Desarrollo de la Información de la Sociedad en Bolivia
.boo	generic	Charleston Road Registry Inc.
.boutique	generic	Over Galley, LLC
.bq	country-code	Not assigned
.br	country-code	Comite Gestor da Internet no Brasil
.brussels	generic	DNS.be vzw
.bs	country-code	The College of the Bahamas
.bt	country-code	Ministry of Information and Communications
.budapest	generic	Top Level Domain Holdings Limited
.build	generic	Plan Bee LLC
.builders	generic	Atomic Madison, LLC
.business	generic	Spring Cross, LLC
.buzz	generic	DOTSTRATEGY CO.
.bv	country-code	UNINETT Norid A/S
.bw	country-code	Botswana Communications Regulatory Authority (BOCRA)
.by	country-code	Reliable Software Inc.
.bz	country-code	University of Belize
.bzh	generic	Association www.bzh
.ca	country-code	Canadian Internet Registration Authority (CIRA) Autorite Canadienne pour les Enregistrements Internet (ACEI)
.cab	generic	Half Sunset, LLC
.cal	generic	Charleston Road Registry Inc.
.camera	generic	Atomic Maple, LLC
.camp	generic	Delta Dynamite, LLC
.cancerresearch	generic	Australian Cancer Research Foundation
.capetown	generic	ZA Central Registry NPC trading as ZA Central Registry
.capital	generic	Delta Mill, LLC
.caravan	generic	Caravan International, Inc.
.cards	generic	Foggy Hollow, LLC
.care	generic	Goose Cross, LLC
.career	generic	dotCareer LLC
.careers	generic	Wild Corner, LLC
.casa	generic	Top Level Domain Holdings Limited
.cash	generic	Delta Lake, LLC
.cat	sponsored	Fundacio puntCAT
.catering	generic	New Falls, LLC
.cc	country-code	eNIC Cocos (Keeling) Islands Pty. Ltd. d/b/a Island Internet Services
.cd	country-code	Office Congolais des Postes et Télécommunications - OCPT
.center	generic	Tin Mill, LLC
.ceo	generic	CEOTLD Pty Ltd
.cern	generic	European Organization for Nuclear Research ("CERN")
.cf	country-code	Societe Centrafricaine de Telecommunications (SOCATEL)
.cg	country-code	ONPT Congo and Interpoint Switzerland
.ch	country-code	SWITCH The Swiss Education & Research Network
.channel	generic	Charleston Road Registry Inc.
.cheap	generic	Sand Cover, LLC
.christmas	generic	Uniregistry, Corp.
.chrome	generic	Charleston Road Registry Inc.
.church	generic	Holly Fileds, LLC
.ci	country-code	INP-HB Institut National Polytechnique Felix Houphouet Boigny
.citic	generic	CITIC Group Corporation
.city	generic	Snow Sky, LLC
.ck	country-code	Telecom Cook Islands Ltd.
.cl	country-code	NIC Chile (University of Chile)
.claims	generic	Black Corner, LLC
.cleaning	generic	Fox Shadow, LLC
.click	generic	Uniregistry, Corp.
.clinic	generic	Goose Park, LLC
.clothing	generic	Steel Lake, LLC
.club	generic	.CLUB DOMAINS, LLC
.cm	country-code	Cameroon Telecommunications (CAMTEL)
.cn	country-code	Computer Network Information Center, Chinese Academy of Sciences
.co	country-code	.CO Internet S.A.S.
.codes	generic	Puff Willow, LLC
.coffee	generic	Trixy Cover, LLC
.college	generic	XYZ.COM LLC
.cologne	generic	NetCologne Gesellschaft für Telekommunikation mbH
.com	generic	VeriSign Global Registry Services
.community	generic	Fox Orchard, LLC
.company	generic	Silver Avenue, LLC
.computer	generic	Pine Mill, LLC
.condos	generic	Pine House, LLC
.construction	generic	Fox Dynamite, LLC
.consulting	generic	United TLD Holdco, LTD.
.contractors	generic	Magic Woods, LLC
.cooking	generic	Top Level Domain Holdings Limited
.cool	generic	Koko Lake, LLC
.coop	sponsored	DotCooperation LLC

Domain	Type	Sponsoring Organisation
.country	generic	Top Level Domain Holdings Limited
.cr	country-code	National Academy of Sciences Academia Nacional de Ciencias
.credit	generic	Snow Shadow, LLC
.creditcard	generic	Binky Frostbite, LLC
.cruises	generic	Spring Way, LLC
.cu	country-code	CENIAInternet Industria y San Jose Capitolio Nacional
.cuisinella	generic	SALM S.A.S.
.cv	country-code	Agência Nacional das Comunicações (ANAC)
.cw	country-code	University of Curacao
.cx	country-code	Christmas Island Internet Administration Limited
.cy	country-code	University of Cyprus
.cymru	generic	Nominet UK
.cz	country-code	CZ.NIC, z.s.p.o
.dad	generic	Charleston Road Registry Inc.
.dance	generic	United TLD Holdco Ltd.
.dating	generic	Pine Fest, LLC
.day	generic	Charleston Road Registry Inc.
.de	country-code	DENIC eG
.deals	generic	Sand Sunset, LLC
.degree	generic	United TLD Holdco, Ltd
.democrat	generic	United TLD Holdco Ltd.
.dental	generic	Tin Birch, LLC
.dentist	generic	United TLD Holdco, Ltd
.desi	generic	Desi Networks LLC
.diamonds	generic	John Edge, LLC
.diet	generic	Uniregistry, Corp.
.digital	generic	Dash Park, LLC
.direct	generic	Half Trail, LLC
.directory	generic	Extra Madison, LLC
.discount	generic	Holly Hill, LLC
.dj	country-code	Djibouti Telecom S.A
.dk	country-code	Dansk Internet Forum
.dm	country-code	DotDM Corporation
.dnp	generic	Dai Nippon Printing Co., Ltd.
.do	country-code	Pontificia Universidad Catolica Madre y Maestra Recinto Santo Tomas de Aquino
.domains	generic	Sugar Cross, LLC
.durban	generic	ZA Central Registry NPC trading as ZA Central Registry
.dvag	generic	Deutsche Vermögensberatung Aktiengesellschaft DVAG
.dz	country-code	CERIST
.eat	generic	Charleston Road Registry Inc.
.ec	country-code	NIC.EC (NICEC) S.A.
.edu	sponsored	EDUCAUSE
.education	generic	Brice Way, LLC
.ee	country-code	Eesti Interneti Sihtasutus (EIS)
.eg	country-code	Egyptian Universities Network (EUN) Supreme Council of Universities
.eh	country-code	Not assigned
.email	generic	Spring Madison, LLC
.engineer	generic	United TLD Holdco Ltd.
.engineering	generic	Romeo Canyon
.enterprises	generic	Snow Oaks, LLC
.equipment	generic	Corn Station, LLC
.er	country-code	Eritrea Telecommunication Services Corporation (EriTel)
.es	country-code	Red.es
.esq	generic	Charleston Road Registry Inc.
.estate	generic	Trixy Park, LLC
.et	country-code	Ethio telecom
.eu	country-code	EURid vzw/asbl
.eus	generic	Puntueus Fundazioa
.events	generic	Pioneer Maple, LLC
.exchange	generic	Spring Falls, LLC
.expert	generic	Magic Pass, LLC
.exposed	generic	Victor Beach, LLC
.fail	generic	Atomic Pipe, LLC
.farm	generic	Just Maple, LLC
.feedback	generic	Top Level Spectrum, Inc.
.fi	country-code	Finnish Communications Regulatory Authority
.finance	generic	Cotton Cypress, LLC
.financial	generic	Just Cover, LLC
.fish	generic	Fox Woods, LLC
.fishing	generic	Top Level Domain Holdings Limited
.fitness	generic	Brice Orchard, LLC
.fj	country-code	The University of the South Pacific IT Services
.fk	country-code	Falkland Islands Government
.flights	generic	Fox Station, LLC
.florist	generic	Half Cypress, LLC
.fly	generic	Charleston Road Registry Inc.
.fm	country-code	FSM Telecommunications Corporation
.fo	country-code	FO Council
.foo	generic	Charleston Road Registry Inc.
.forsale	generic	United TLD Holdco, LLC

Domain	Type	Sponsoring Organisation
.foundation	generic	John Dale, LLC
.fr	country-code	Association Française pour le Nommage Internet en Coopération (A.F.N.I.C.)
.fri	generic	FRLregistry B.V.
.frogans	generic	OP3FT
.fund	generic	John Castle, LLC
.furniture	generic	Lone Fields, LLC
.futbol	generic	United TLD Holdco, Ltd.
.ga	country-code	Agence Nationale des Infrastructures Numériques et des Fréquences (ANINF)
.gal	generic	Asociación puntoGAL
.gallery	generic	Sugar House, LLC
.gb	country-code	Reserved Domain - IANA
.gbiz	generic	Charleston Road Registry Inc.
.gd	country-code	The National Telecommunications Regulatory Commission (NTRC)
.ge	country-code	Caucasus Online
.gent	generic	COMBELL GROUP NV/SA
.gf	country-code	Net Plus
.gg	country-code	Island Networks Ltd.
.gh	country-code	Network Computer Systems Limited
.gi	country-code	Sapphire Networks
.gift	generic	Uniregistry, Corp.
.gifts	generic	Goose Sky, LLC
.gives	generic	United TLD Holdco Ltd.
.gl	country-code	TELE Greenland A/S
.glass	generic	Black Cover, LLC
.gle	generic	Charleston Road Registry Inc.
.global	generic	Dot GLOBAL AS
.globo	generic	Globo Comunicação e Participações S.A
.gm	country-code	GM-NIC
.gmail	generic	Charleston Road Registry Inc.
.gmo	generic	GMO Internet, Inc.
.gmx	generic	1&1 Mail & Media GmbH
.gn	country-code	Centre National des Sciences Halieutiques de Boussoura
.google	generic	Charleston Road Registry Inc.
.gop	generic	Republican State Leadership Committee, Inc.
.gov	sponsored	General Services Administration Attn: QTDC, 2E08 (.gov Domain Registration)
.gp	country-code	Networking Technologies Group
.gq	country-code	GETESA
.gr	country-code	ICS-FORTH GR
.graphics	generic	Over Madison, LLC
.gratis	generic	Pioneer Tigers, LLC
.green	generic	Afilias Limited
.gripe	generic	Corn Sunset, LLC
.gs	country-code	Government of South Georgia and South Sandwich Islands (GSGSSI)
.gt	country-code	Universidad del Valle de Guatemala
.gu	country-code	University of Guam Computer Center
.guide	generic	Snow Moon, LLC
.guitars	generic	Uniregistry, Corp.
.guru	generic	Pioneer Cypress, LLC
.gw	country-code	Autoridade Reguladora Nacional - Tecnologias de Informação e Comunicação da Guiné-Bissau
.gy	country-code	University of Guyana
.hamburg	generic	Hamburg Top-Level-Domain GmbH
.haus	generic	United TLD Holdco, LTD.
.healthcare	generic	Silver Glen, LLC
.help	generic	Uniregistry, Corp.
.here	generic	Charleston Road Registry Inc.
.hiphop	generic	Uniregistry, Corp.
.hiv	generic	dotHIV gemeinnuetziger e.V.
.hk	country-code	Hong Kong Internet Registration Corporation Ltd.
.hm	country-code	HM Domain Registry
.hn	country-code	Red de Desarrollo Sostenible Honduras
.holdings	generic	John Madison, LLC
.holiday	generic	Goose Woods, LLC
.homes	generic	DERHomes, LLC
.horse	generic	Top Level Domain Holdings Limited
.host	generic	DotHost Inc.
.hosting	generic	Uniregistry, Corp.
.house	generic	Sugar Park, LLC
.how	generic	Charleston Road Registry Inc.
.hr	country-code	CARNet - Croatian Academic and Research Network
.ht	country-code	Consortium FDS/RDDH
.hu	country-code	Council of Hungarian Internet Providers (CHIP)
.ibm	generic	International Business Machines Corporation
.id	country-code	Perkumpulan Pengelola Nama Domain Internet Indonesia (PANDI)
.ie	country-code	University College Dublin Computing Services Computer Centre
.il	country-code	Internet Society of Israel
.im	country-code	Isle of Man Government
.immo	generic	Auburn Bloom, LLC
.immobilier	generic	United TLD Holdco Ltd.
.in	country-code	National Internet Exchange of India
.industries	generic	Outer House, LLC

Domain	Type	Sponsoring Organisation
.info	generic	Afilias Limited
.ing	generic	Charleston Road Registry Inc.
.ink	generic	Top Level Design, LLC
.institute	generic	Outer Maple, LLC
.insure	generic	Pioneer Willow, LLC
.int	sponsored	Internet Assigned Numbers Authority
.international	generic	Wild Way, LLC
.investments	generic	Holly Glen, LLC
.io	country-code	IO Top Level Domain Registry Cable and Wireless
.iq	country-code	Communications and Media Commission (CMC)
.ir	country-code	Institute for Research in Fundamental Sciences
.is	country-code	ISNIC - Internet Iceland Ltd.
.it	country-code	IIT - CNR
.je	country-code	Island Networks (Jersey) Ltd.
.jetzt	generic	New TLD Company AB
.jm	country-code	University of West Indies
.jo	country-code	National Information Technology Center (NITC)
.jobs	sponsored	Employ Media LLC
.joburg	generic	ZA Central Registry NPC trading as ZA Central Registry
.jp	country-code	Japan Registry Services Co., Ltd.
.juegos	generic	Uniregistry, Corp.
.kaufen	generic	United TLD Holdco Ltd.
.ke	country-code	Kenya Network Information Center (KeNIC)
.kg	country-code	AsialInfo Telecommunication Enterprise
.kh	country-code	Ministry of Post and Telecommunications
.ki	country-code	Ministry of Communications, Transport, and Tourism Development
.kim	generic	Afilias Limited
.kitchen	generic	Just Goodbye, LLC
.kiwi	generic	DOT KIWI LIMITED
.km	country-code	Comores Telecom
.kn	country-code	Ministry of Finance, Sustainable Development Information & Technology
.koeln	generic	NetCologne Gesellschaft für Telekommunikation mbH
.kp	country-code	Star Joint Venture Company
.kr	country-code	Korea Internet & Security Agency (KISA)
.krd	generic	KRG Department of Information Technology
.kred	generic	KredTLD Pty Ltd
.kw	country-code	Ministry of Communications
.ky	country-code	The Information and Communications Technology Authority
.kz	country-code	Association of IT Companies of Kazakhstan
.la	country-code	Lao National Internet Committee (LANIC), Ministry of Posts and Telecommunications
.lacaixa	generic	CAIXA D'ESTALVIS I PENSIONS DE BARCELONA
.land	generic	Pine Moon, LLC
.lawyer	generic	United TLD Holdco, Ltd
.lb	country-code	American University of Beirut Computing and Networking Services
.lc	country-code	University of Puerto Rico
.lease	generic	Victor Trail, LLC
.lgbt	generic	Afilias Limited
.li	country-code	Universitaet Liechtenstein
.life	generic	Trixy Oaks, LLC
.lighting	generic	John McCook, LLC
.limited	generic	Big Fest, LLC
.limo	generic	Hidden Frostbite, LLC
.link	generic	Uniregistry, Corp.
.lk	country-code	Council for Information Technology LK Domain Registrar
.loans	generic	June Woods, LLC
.london	generic	Dot London Domains Limited
.lotto	generic	Afilias Limited
.lr	country-code	Data Technology Solutions, Inc.
.ls	country-code	National University of Lesotho
.lt	country-code	Kaunas University of Technology
.ltda	generic	InterNetX Corp.
.lu	country-code	RESTENA
.luxe	generic	Top Level Domain Holdings Limited
.luxury	generic	Luxury Partners LLC
.lv	country-code	University of Latvia Institute of Mathematics and Computer Science Department of Network Solutions (DNS)
.ly	country-code	General Post and Telecommunication Company
.ma	country-code	Agence Nationale de Réglementation des Télécommunications (ANRT)
.maison	generic	Victor Frostbite, LLC
.management	generic	John Goodbye, LLC
.mango	generic	PUNTO FA S.L.
.market	generic	United TLD Holdco, Ltd
.marketing	generic	Fern Pass, LLC
.mc	country-code	Gouvernement de Monaco Direction des Communications Electroniques
.md	country-code	MoldData S.E.
.me	country-code	Government of Montenegro
.media	generic	Grand Glen, LLC
.meet	generic	Afilias Limited
.melbourne	generic	The Crown in right of the State of Victoria, represented by its Department of State Development, Business and Innovation
.meme	generic	Charleston Road Registry Inc.

Domain	Type	Sponsoring Organisation
.menu	generic	Wedding TLD2, LLC
.mf	country-code	Not assigned
.mg	country-code	NIC-MG (Network Information Center Madagascar)
.mh	country-code	Office of the Cabinet
.miami	generic	Top Level Domain Holdings Limited
.mil	sponsored	DoD Network Information Center
.mini	generic	Bayerische Motoren Werke Aktiengesellschaft
.mk	country-code	Ministry of Foreign Affairs
.ml	country-code	Agence des Technologies de l'Information et de la Communication
.mm	country-code	Ministry of Communications, Posts & Telegraphs
.mn	country-code	Datacom Co., Ltd.
.mo	country-code	Bureau of Telecommunications Regulation (DSRT)
.mobi	sponsored	Afilias Technologies Limited dba dotMobi
.moda	generic	United TLD Holdco Ltd.
.moe	generic	Interlink Co., Ltd.
.monash	generic	Monash University
.mortgage	generic	United TLD Holdco, Ltd
.moscow	generic	Foundation for Assistance for Internet Technologies and Infrastructure Development (FAITID)
.motorcycles	generic	DERMotorcycles, LLC
.mov	generic	Charleston Road Registry Inc.
.mp	country-code	Saipan Datacom, Inc.
.mq	country-code	MEDIASERV
.mr	country-code	University of Nouakchott
.ms	country-code	MNI Networks Ltd.
.mt	country-code	NIC (Malta)
.mu	country-code	Internet Direct Ltd
.museum	sponsored	Museum Domain Management Association
.mv	country-code	Dhiraagu Pvt. Ltd. (DHIVEHINET)
.mw	country-code	Malawi Sustainable Development Network Programme (Malawi SDNP)
.mx	country-code	NIC-Mexico ITESM - Campus Monterrey
.my	country-code	MYNIC Berhad
.mz	country-code	Centro de Informatica de Universidade Eduardo Mondlane
.na	country-code	Namibian Network Information Center
.nagoya	generic	GMO Registry, Inc.
.name	generic-restricted	VeriSign Information Services, Inc.
.navy	generic	United TLD Holdco Ltd.
.nc	country-code	Office des Postes et Telecommunications
.ne	country-code	SONITEL
.net	generic	VeriSign Global Registry Services
.network	generic	Trixy Manor, LLC
.neustar	generic	NeuStar, Inc.
.new	generic	Charleston Road Registry Inc.
.nexus	generic	Charleston Road Registry Inc.
.nf	country-code	Norfolk Island Data Services
.ng	country-code	Nigeria Internet Registration Association
.ngo	generic	Public Interest Registry
.nhk	generic	Japan Broadcasting Corporation (NHK)
.ni	country-code	Universidad Nacional del Ingerieria Centro de Computo
.ninja	generic	United TLD Holdco Ltd.
.nl	country-code	SIDN (Stichting Internet Domeinregistratie Nederland)
.no	country-code	UNINETT Norid A/S
.np	country-code	Mercantile Communications Pvt. Ltd.
.nr	country-code	CENPAC NET
.nra	generic	NRA Holdings Company, INC.
.nrw	generic	Minds + Machines GmbH
.nu	country-code	The IUSN Foundation
.nyc	generic	The City of New York by and through the New York City Department of Information Technology & Telecommunications
.nz	country-code	InternetNZ
.okinawa	generic	BusinessRalliart inc.
.om	country-code	Telecommunications Regulatory Authority (TRA)
.org	generic	Public Interest Registry
.oni	generic	I-REGISTRY Ltd., Niederlassung Deutschland
.ooo	generic	INFIBEAM INCORPORATION LIMITED
.org	generic	Public Interest Registry (PIR)
.organic	generic	Afilias Limited
.otsuka	generic	Otsuka Holdings Co., Ltd.
.ovh	generic	OVH SAS
.pa	country-code	Universidad Tecnologica de Panama
.paris	generic	City of Paris
.partners	generic	Magic Glen, LLC
.parts	generic	Sea Goodbye, LLC
.pe	country-code	Red Cientifica Peruana
.pf	country-code	Gouvernement de la Polynésie française
.pg	country-code	PNG DNS Administration Vice Chancellors Office
.ph	country-code	The Papua New Guinea University of Technology
.pharmacy	generic	PH Domain Foundation
.photo	generic	National Association of Boards of Pharmacy
.photography	generic	Uniregistry, Corp.
	generic	Sugar Glen, LLC

Domain	Type	Sponsoring Organisation
.photos	generic	Sea Corner, LLC
.physio	generic	PhysBiz Pty Ltd
.pics	generic	Uniregistry, Corp.
.pictures	generic	Foggy Sky, LLC
.pink	generic	Afilias Limited
.pizza	generic	Foggy Moon, LLC
.pk	country-code	PKNIC
.pl	country-code	Research and Academic Computer Network
.place	generic	Snow Galley, LLC
.plumbing	generic	Spring Tigers, LLC
.pm	country-code	Association Française pour le Nommage Internet en Coopération (A.F.N.I.C.)
.pn	country-code	Pitcairn Island Administration
.pohl	generic	Deutsche Vermögensberatung Aktiengesellschaft DVAG
.post	sponsored	Universal Postal Union
.pr	country-code	Gauss Research Laboratory Inc.
.praxi	generic	Praxi S.p.A.
.press	generic	DotPress Inc.
.pro	generic-restricted	Registry Services Corporation dba RegistryPro
.prod	generic	Charleston Road Registry Inc.
.productions	generic	Magic Birch, LLC
.prof	generic	Charleston Road Registry Inc.
.properties	generic	Big Pass, LLC
.property	generic	Uniregistry, Corp.
.ps	country-code	Ministry Of Telecommunications & Information Technology, Government Computer Center.
.pt	country-code	Associação DNS.PT
.pub	generic	United TLD Holdco Ltd.
.pw	country-code	Micronesia Investment and Development Corporation
.py	country-code	NIC-PY
.qa	country-code	The Supreme Council of Information and Communication Technology (ictQATAR)
.qpon	generic	dotCOOL, Inc.
.quebec	generic	PointQuébec Inc
.re	country-code	Association Française pour le Nommage Internet en Coopération (A.F.N.I.C.)
.realtor	generic	Real Estate Domains LLC
.recipes	generic	Grand Island, LLC
.red	generic	Afilias Limited
.rehab	generic	United TLD Holdco Ltd.
.reise	generic	dotreise GmbH
.reisen	generic	New Cypress, LLC
.ren	generic	Beijing Qianxiang Wangjing Technology Development Co., Ltd.
.rentals	generic	Big Hollow, LLC
.repair	generic	Lone Sunset, LLC
.report	generic	Binky Glen, LLC
.republican	generic	United TLD Holdco Ltd.
.rest	generic	Punto 2012 Sociedad Anonima Promotora de Inversion de Capital Variable
.restaurant	generic	Snow Avenue, LLC
.reviews	generic	United TLD Holdco, Ltd.
.rich	generic	I-REGISTRY Ltd., Niederlassung Deutschland
.rio	generic	Empresa Municipal de Informática SA - IPLANRIO
.ro	country-code	National Institute for R&D in Informatics
.rocks	generic	United TLD Holdco, LTD.
.rodeo	generic	Top Level Domain Holdings Limited
.rs	country-code	Serbian National Internet Domain Registry (RNIDS)
.rsvp	generic	Charleston Road Registry Inc.
.ru	country-code	Coordination Center for TLD RU
.ruhr	generic	regiodot GmbH & Co. KG
.rw	country-code	Rwanda Information Communication and Technology Association (RICTA)
.ryukyu	generic	BusinessRalliart inc.
.sa	country-code	Communications and Information Technology Commission
.saarland	generic	dotSaarland GmbH
.sarl	generic	Delta Orchard, LLC
.sb	country-code	Solomon Telekom Company Limited
.sc	country-code	VCS Pty Ltd
.sca	generic	SVENSKA CELLULOSA AKTIEBOLAGET SCA (publ)
.scb	generic	The Siam Commercial Bank Public Company Limited ("SCB")
.schmidt	generic	SALM S.A.S.
.schule	generic	Outer Moon, LLC
.scot	generic	Dot Scot Registry Limited
.sd	country-code	Sudan Internet Society
.se	country-code	The Internet Infrastructure Foundation
.services	generic	Fox Castle, LLC
.sexy	generic	Uniregistry, Corp.
.sg	country-code	Singapore Network Information Centre (SGNIC) Pte Ltd
.sh	country-code	Government of St. Helena
.shiksha	generic	Afilias Limited
.shoes	generic	Binky Galley, LLC
.si	country-code	Academic and Research Network of Slovenia (ARNES)
.singles	generic	Fern Madison, LLC
.sj	country-code	UNINETT Norid A/S
.sk	country-code	SK-NIC, a.s.

Domain	Type	Sponsoring Organisation
.sl	country-code	Sierratel
.sm	country-code	Telecom Italia San Marino S.p.A.
.sn	country-code	Universite Cheikh Anta Diop NIC Senegal
.so	country-code	Ministry of Post and Telecommunications
.social	generic	United TLD Holdco Ltd.
.software	generic	United TLD Holdco, Ltd
.sohu	generic	Sohu.com Limited
.solar	generic	Ruby Town, LLC
.solutions	generic	Silver Cover, LLC
.soy	generic	Charleston Road Registry Inc.
.space	generic	DotSpace Inc.
.spiegel	generic	SPIEGEL-Verlag Rudolf Augstein GmbH & Co. KG
.sr	country-code	Telesur
.ss	country-code	Not assigned
.st	country-code	Tecnisys
.su	country-code	Russian Institute for Development of Public Networks (ROSNIROS)
.supplies	generic	Atomic Fields, LLC
.supply	generic	Half Falls, LLC
.support	generic	Grand Orchard, LLC
.surf	generic	Top Level Domain Holdings Limited
.surgery	generic	Tin Avenue, LLC
.suzuki	generic	SUZUKI MOTOR CORPORATION
.sv	country-code	SVNet
.sx	country-code	SX Registry SA B.V.
.sy	country-code	National Agency for Network Services (NANS)
.systems	generic	Dash Cypress, LLC
.sz	country-code	University of Swaziland Department of Computer Science
.tatar	generic	Limited Liability Company "Coordination Center of Regional Domain of Tatarstan Republic"
.tattoo	generic	Uniregistry, Corp.
.tax	generic	Storm Orchard, LLC
.tc	country-code	Melrex TC
.td	country-code	Société des télécommunications du Tchad (SOTEL TCHAD)
.technology	generic	Auburn Falls, LLC
.tel	sponsored	Telnic Ltd.
.tf	country-code	Association Française pour le Nommage Internet en Coopération (A.F.N.I.C.)
.tg	country-code	Cafe Informatique et Telecommunications
.th	country-code	Thai Network Information Center Foundation
.tienda	generic	Victor Manor, LLC
.tips	generic	Corn Willow, LLC
.tirol	generic	punkt Tirol GmbH
.tj	country-code	Information Technology Center
.tk	country-code	Telecommunication Tokelau Corporation (Teletok)
.tl	country-code	Ministry of Transport and Communications; National Division of Information and Technology
.tm	country-code	TM Domain Registry Ltd
.tn	country-code	Agence Tunisienne d'Internet
.to	country-code	Government of the Kingdom of Tonga H.R.H. Crown Prince Tupouto'a c/o Consulate of Tonga
.today	generic	Pearl Woods, LLC
.tokyo	generic	GMO Registry, Inc.
.tools	generic	Pioneer North, LLC
.top	generic	Jiangsu Bangning Science & Technology Co.,Ltd.
.town	generic	Koko Moon, LLC
.toys	generic	Pioneer Orchard, LLC
.tp	country-code	-
.tr	country-code	Middle East Technical University Department of Computer Engineering
.trade	generic	Elite Registry Limited
.training	generic	Wild Willow, LLC
.travel	sponsored	Tralliance Registry Management Company, LLC.
.tt	country-code	University of the West Indies Faculty of Engineering
.tui	generic	TUI AG
.tv	country-code	Ministry of Finance and Tourism
.tw	country-code	Taiwan Network Information Center (TWNIC)
.tz	country-code	Tanzania Network Information Centre (tzNIC)
.ua	country-code	Hostmaster Ltd.
.ug	country-code	Uganda Online Ltd.
.uk	country-code	Nominet UK
.um	country-code	Not assigned
.university	generic	Little Station, LLC
.uno	generic	Dot Latin LLC
.uoi	generic	UBN INTERNET LTDA.
.us	country-code	NeuStar, Inc.
.uy	country-code	SeCIU - Universidad de la Republica
.uz	country-code	Computerization and Information Technologies Developing Center UZINFOCOM
.va	country-code	Holy See Secretariat of State Department of Telecommunications
.vacations	generic	Atomic Tigers, LLC
.vc	country-code	Ministry of Telecommunications, Science, Technology and Industry
.ve	country-code	Comisión Nacional de Telecomunicaciones (CONATEL)
.vegas	generic	Dot Vegas, Inc.
.ventures	generic	Binky Lake, LLC
.versicherung	generic	dotversicherung-registry GmbH
.vet	generic	United TLD Holdco, Ltd

Domain	Type	Sponsoring Organisation
.vg	country-code	Telecommunications Regulatory Commission of the Virgin Islands
.vi	country-code	Virgin Islands Public Telecommunications System c/o COBEX Internet Services
.viajes	generic	Black Madison, LLC
.villas	generic	New Sky, LLC
.vision	generic	Koko Station, LLC
.viaanderen	generic	DNS.be vzw
.vn	country-code	Ministry of Information and Communications of Socialist Republic of Viet Nam
.vodka	generic	Top Level Domain Holdings Limited
.vote	generic	Monolith Registry LLC
.voting	generic	Valuetainment Corp.
.voto	generic	Monolith Registry LLC
.voyage	generic	Ruby House, LLC
.vu	country-code	Telecom Vanuatu Limited
.wales	generic	Nominet UK
.wang	generic	Zodiac Registry Limited
.watch	generic	Sand Shadow, LLC
.webcam	generic	dot Webcam Limited
.website	generic	DotWebsite Inc.
.wed	generic	Atgron, Inc.
.wf	country-code	Association Française pour le Nommage Internet en Coopération (A.F.N.I.C.)
.whoswho	generic	Who's Who Registry
.wien	generic	punkt.wien GmbH
.wiki	generic	Top Level Design, LLC
.williamhill	generic	William Hill Organization Limited
.wme	generic	William Morris Endeavor Entertainment, LLC
.work	generic	Top Level Domain Holdings Limited
.works	generic	Little Dynamite, LLC
.world	generic	Bitter Fields, LLC
.ws	country-code	Government of Samoa Ministry of Foreign Affairs & Trade
.wtc	generic	World Trade Centers Association, Inc.
.wtf	generic	Hidden Way, LLC
.测试	test	Internet Assigned Numbers Authority
.परीक्षा	test	Internet Assigned Numbers Authority
.佛山	generic	Guangzhou YU Wei Information Technology Co., Ltd.
.集团	generic	Eagle Horizon Limited
.在线	generic	TLD REGISTRY LIMITED
.한국	country-code	KISA (Korea Internet & Security Agency)
.ভারত	country-code	National Internet Exchange of India
.موقع	generic	Suhub Electronic Establishment
.बाला	country-code	Not assigned
.公益	generic	China Organizational Name Administration Center
.公司	generic	Computer Network Information Center of Chinese Academy of Sciences (China Internet Network Information Center)
.移动	generic	Afilias Limited
.我爱你	generic	Tycoon Treasure Limited
.москва	generic	Foundation for Assistance for Internet Technologies and Infrastructure Development (FAITID)
.испытание	test	Internet Assigned Numbers Authority
.қаз	country-code	Association of IT Companies of Kazakhstan
.онлайн	generic	CORE Association
.сайт	generic	CORE Association
.срб	country-code	Serbian National Internet Domain Registry (RNIDS)
.бел	country-code	Not assigned
.테스트	test	Internet Assigned Numbers Authority
.org	generic	Public Interest Registry
.삼성	generic	SAMSUNG SDS CO., LTD
.சிங்கப்பூர்	country-code	Singapore Network Information Centre (SGNIC) Pte Ltd
.商标	generic	HU YI GLOBAL INFORMATION RESOURCES(HOLDING) COMPANY.HONGKONG LIMITED
.商城	generic	Zodiac Aquarius Limited
.дети	generic	The Foundation for Network Initiatives "The Smart Internet"
.мкд	country-code	Not assigned
.soyo	test	Internet Assigned Numbers Authority
.中文网	generic	TLD REGISTRY LIMITED
.中信	generic	CITIC Group Corporation
.中国	country-code	China Internet Network Information Center
.中國	country-code	China Internet Network Information Center
.ಭಾರತ	country-code	National Internet Exchange of India
.சி	country-code	LK Domain Registry
.测试	test	Internet Assigned Numbers Authority
.ભારત	country-code	National Internet Exchange of India
.भारत	country-code	National Internet Exchange of India
.ازمیشی	test	Internet Assigned Numbers Authority
.பிரிடைசு	test	Internet Assigned Numbers Authority
.संगठन	generic	Public Interest Registry
.网络	generic	Computer Network Information Center of Chinese Academy of Sciences (China Internet Network Information Center)
.укр	country-code	Ukrainian Network Information Centre (UANIC), Inc.
.香港	country-code	Hong Kong Internet Registration Corporation Ltd.
.दोकिमि	test	Internet Assigned Numbers Authority
.اختار	test	Internet Assigned Numbers Authority
.台湾	country-code	Taiwan Network Information Center (TWNIC)

Domain	Type	Sponsoring Organisation
.台灣	country-code	Taiwan Network Information Center (TWNIC)
.手机	generic	Beijing RITT-Net Technology Development Co., Ltd
.MOH	country-code	Datacom Co.,Ltd
.الجزائر	country-code	CERIST
.عمان	country-code	Telecommunications Regulatory Authority (TRA)
.ایران	country-code	Institute for Research in Fundamental Sciences (IPM)
.امارات	country-code	Telecommunications Regulatory Authority (TRA)
.بازار	generic	CORE Association
.پاکستان	country-code	Not assigned
.الأردن	country-code	National Information Technology Center (NITC)
.بھارت	country-code	National Internet Exchange of India
.المغرب	country-code	Agence Nationale de Réglementation des Télécommunications (ANRT)
.السعودية	country-code	Communications and Information Technology Commission
.سودان	country-code	Not assigned
.عراق	country-code	Not assigned
.مليسيا	country-code	MYNIC Berhad
.شبكة	generic	International Domain Registry Pty. Ltd.
.ڊو	country-code	Not assigned
.机构	generic	Public Interest Registry
.组织机构	generic	Public Interest Registry
.ไทย	country-code	Thai Network Information Center Foundation
.سورية	country-code	National Agency for Network Services (NANS)
.pyc	generic	Rusnames Limited
.рф	country-code	Coordination Center for TLD RU
.تونس	country-code	Agence Tunisienne d'Internet
.みんな	generic	Charleston Road Registry Inc.
.世界	generic	Stable Tone Limited
.ভাৰত	country-code	National Internet Exchange of India
.网址	generic	HU YI GLOBAL INFORMATION RESOURCES (HOLDING) COMPANY. HONGKONG LIMITED
.游戏	generic	Spring Fields, LLC
.vermögensberater	generic	Deutsche Vermögensberatung Aktiengesellschaft DVAG
.vermögensberatung	generic	Deutsche Vermögensberatung Aktiengesellschaft DVAG
.企业	generic	Dash McCook, LLC
.مصر	country-code	National Telecommunication Regulatory Authority - NTRA
.قطر	country-code	Supreme Council for Communications and Information Technology (ictQATAR)
.广东	generic	Guangzhou YU Wei Information Technology Co., Ltd.
.இலங்கை	country-code	LK Domain Registry
.இந்தியா	country-code	National Internet Exchange of India
.新加坡	country-code	Singapore Network Information Centre (SGNIC) Pte Ltd
.فلسطين	country-code	Ministry of Telecom & Information Technology (MTIT)
.テスト	test	Internet Assigned Numbers Authority
.政务	generic	China Organizational Name Administration Center
.xxx	sponsored	ICM Registry LLC
.xyz	generic	XYZ.COM LLC
.yachts	generic	DERYachts, LLC
.yandex	generic	YANDEX, LLC
.ye	country-code	TeleYemen
.yokohama	generic	GMO Registry, Inc.
.youtube	generic	Charleston Road Registry Inc.
.yt	country-code	Association Française pour le Nommage Internet en Coopération (A.F.N.I.C.)
.za	country-code	ZA Domain Name Authority
.zip	generic	Charleston Road Registry Inc.
.zm	country-code	Zambia Information and Communications Technology Authority (ZICTA)
.zone	generic	Outer Falls, LLC
.zw	country-code	Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ)

Exhibit L

CIVIL ACTION NOS. 00-2602-RCL; 00-2601-RCL; 01-1655-RCL;
02-1811-RCL; 08-520-RCL; 14-648-RCL; 08-502-RCL



Internet Assigned Numbers Authority

Presentations

IANA is engaged in the various communities it serves, often providing presentations on the status of IANA, or on particular topical matters. We endeavour to place presentations we give in public forums at this page.

Date	Title	Event	Author
2014-04-21	IPv4 to IPv6 Migration	ATLAS II Capacity Building Webinar	Leo Vegoda
2014-04-15	IANA Activities Update	ARIN 33: Chicago, USA	Elise Gerich
2014-02-26	IANA Activities Update	APNIC 37, Petaling Jaya, MY	Leo Vegoda
2013-12-18	IPv6 for Registrars	Webinar	Leo Vegoda
2013-11-28	Mise a jour sur les activites de l'IANA et du DNS	AFRINIC 19, Abidjan, CI	Leo Vegoda
2013-11-03	Making Special Better	IETF 88 Vancouver	Pearl Liang
2013-10-30	Update, IANA Department!	LACNIC 20, Willemstad, CW	Elise Gerich
2013-10-18	IANA & DNS Update	RIPE 67, Athens, GR	Selina Harrington
2013-10-17	Introduction to IPv6	ALAC Webinar, The Internet	Leo Vegoda
2013-10-10	IANA Activities Update	ARIN 32, Chandler, AZ, USA	Leo Vegoda
2013-08-25	IANA & DNS Update	APNIC 36, Xi'an, CN	Elise Gerich
2013-07-10	The Decline of Scarcity	TWNIC 20, Taipei, TW	Elise Gerich
2013-06-20	IANA Activités à jour	AIS 2013: Lusaka, Zambia	Leo Vegoda
2013-05-12	Comparison of RRL behaviour in BIND9, Knot DNS, and NSD	OARC Workshop: Dublin, Ireland	Dave Knight
2013-05-09	IANA Actividades Recientes	LACNIC 19: Medellín, CO	Leo Vegoda
2013-04-29	IANA Activities Update	ARIN 31: Bridgetown, Barbados	Selina Harrington
2013-02-26	IANA Activities Update	APNIC 35: Singapore	Elise Gerich
2012-11-15	IANA Update	AfriNIC 17: Khartoum, Sudan	Leo Vegoda
2012-10-25	IANA Update	ARIN XXX: Dallas, USA	Leo Vegoda
2012-09-26	IANA Update	RIPE 65: Amsterdam, NL	Leo Vegoda
2012-08-12	IANA Update	APNIC 34: Phnom Penh, KH	Elise Gerich
2012-05-08	IANA Update	LACNIC XVII: Quito, Ecuador	Rodrigo de la Parra
2011-10-12	IANA Update	ARIN 28: Philadelphia, USA	Leo Vegoda
2011-09-15	Internet Number Certification	AusNOG 5: Sydney, Australia	Terry Manderson
2011-07-14	IPv4 – IPv6: Who Should Know	Lightreading: Unknown	Elise Gerich
2011-07-07	IPv6 – Successor to IPv4 Confronting Transition	Transforming the Internet: Kingston, Jamaica	Leo Vegoda
2011-05-04	IANA Update	RIPE 62: Amsterdam, Netherlands	Leo Vegoda
2011-04-04	IANA Update	ARIN XVII: San Juan, Puerto Rico	Elise Gerich
2011-03-13	Filtering DNS message capture with tcpdump	DNS OARC Workshop: San Francisco, US	Dave Knight
2011-02-16	IANA Update	APNIC 31: Hong Kong	Leo Vegoda
2010-11-03	Doom, gloom and IP addresses	GoGoNet Live: San Jose, USA	Elise Gerich
2010-10-25	Protocol Parameter Area Overview	Board IANA Committee: Internal	Michelle Cotton

Date	Title	Event	Author
2010-10-22	IANA Status Update	MENOG 7: Istanbul, Turkey	Mehmet Akcin
2010-10-20	IANA Update	LACNIC XIV: Sao Paulo, Brazil	Mehmet Akcin
2010-10-07	IANA Status Update	ARIN XXVI: Atlanta, USA	Barbara Roseman
2010-09-29	One World, One Internet A Historical Perspective	RIPE NCC Regional Meeting: Moscow, Russia	Elise Gerich
2010-08-29	IPv4 Address Space Registry and proposed changes at the IETF	APNIC 32: Unknown	Elise Gerich
2010-08-27	IANA Update	APNIC 30: Unknown	Elise Gerich
2010-05-21	Actualización de IANA	LACNIC XIII: Curacao	Leo Vegoda
2010-05-05	Changes to in-addr.arpa and ip6.arpa	RIPE 62: Amsterdam, Netherlands	Dave Knight
2009-10-08	Interim Trust Anchor Repository Update	RIPE: Lisbon, Portugal	Kim Davies
2009-10-08	IP Addressing	ITU: Geneva, Switzerland	Leo Vegoda
2009-10-04	IANA Update	RIPE 59: Lisbon, Portugal	Leo Vegoda
2009-10-02	Quick Update for CENTR	CENTR: Vilnius, Lithuania	Kim Davies
2009-09-24	IPv6 Deployment Overview	APECTEL 40: Cancun, Mexico	Leo Vegoda
2009-05-21	Mise à Jour, IANA	AFRINIC 10: Cairo, Egypt	Leo Vegoda
2009-05-06	IANA Update	RIPE 58: Amsterdam, Netherlands	Leo Vegoda
2009-04-27	IANA Update	ARIN XXIII: San Antonio, USA	Leo Vegoda
2009-03-04	Interim Trust Anchor Repository	ICANN 34: Mexico City, Mexico	Kim Davies
2009-03-03	Root zone update for TLD Managers	ICANN 34: Mexico City, Mexico	Kim Davies
2009-02-17	DNSSEC and Routing Security	Cyber City Security Conference	Leo Vegoda
2008-11-24	Mise à Jour IANA	AfriNIC 9: Pointe Aux Piments, Mauritius	Leo Vegoda
2008-11-03	2008 DNS Cache Poisoning Vulnerability	ICANN 33: Cairo, Egypt	Kim Davies
2008-10-14	DNSSEC at IANA	NANOG 44: Los Angeles, USA	Richard Lamb
2008-10-13	IANA Report on Names and Number Resources	AfriNIC: Dakar, Senegal	Leo Vegoda
2008-10-13	IPv6 Deployment - Global Perspective	AfriNIC: Dakar, Senegal	Leo Vegoda
2008-10-02	DNS Cache Poisoning Vulnerability	CENTR: Viareggio, Italy	Kim Davies
2008-09-29	Introduction to IANA	ICANN At Large	Kim Davies
2008-09-28	Una introducción a IANA — Notas de presentación	ICANN At Large	Kim Davies
2008-09-28	Présentation de l'IANA — Notes de présentation	ICANN At Large	Kim Davies
2008-09-28	Introduction to IANA — Presentation Notes	ICANN At Large	Kim Davies
2008-09-09	Saving the Internet from doom	Regional Summit: Sofia, Bulgaria	Kim Davies
2008-08-28	APNIC Update	APNIC: Christchurch, New Zealand	Leo Vegoda
2008-06-24	NCUC Update	ICANN Paris	Kim Davies
2008-06-24	ccNSO Update	ICANN Paris	Kim Davies
2008-06-05	Topics of Interest	CENTR 36: Iraklion, Greece	Kim Davies
2008-05-30	ICANN & IPv6	EU IPv6 Day: Brussels, Belgium	Leo Vegoda
2008-05-28	Actualización de IANA	LACTLD: Salvador-Bahia, Brazil	Barbara Roseman
2008-05-06	IANA Update at RIPE 56	RIPE: Berlin, Germany	Leo Vegoda
2008-05-02	Why IPv6 Support by Domain Registrars is Important	Registrar Conference: New Orleans, USA	Leo Vegoda
2008-02-20	Trying to measure the use of unallocated IPv4 address space	NANOG 42: San Jose, USA	Leo Vegoda
2008-02-13	Update on IANA	ICANN Meetings: New Delhi, India	Barbara Roseman

Date	Title	Event	Author
2008-02-04	Trying to measure the use of unallocated address space	ESNOG 1: Madrid, Spain	Leo Vegoda
2008-01-14	Trying to measure the use of unallocated IPv4 address space	UKNOF 9: London, England	Leo Vegoda
2007-11-26	Resource management: IPv4 depletion and IPv6 registration	Australian IPv6 Summit: Canberra, Australia	Leo Vegoda
2007-11-13	IANA's role in managing the DNS	UN Internet Governance Forum: Rio de Janeiro, Brazil	Kim Davies
2007-10-22	Coming soon to a network near you	RIPE 55: Amsterdam, Netherlands	Leo Vegoda
2007-10-16	Coming soon to a network near you	NANOG 41: Albuquerque, USA	Leo Vegoda
2007-09-07	IANA Addressing & DNS Update	APNIC: New Delhi, India	Leo Vegoda
2007-07-27	Reclaiming our legacy address space	AfriNIC 7: Durban, South Africa	Leo Vegoda
2007-06-24	Deploying IPv6 in IPv4 networks	AfriNIC 7: Durban, South Africa	Leo Vegoda
2007-06-07	IANA Update	ICANN 29: San Juan, Puerto Rico	David Conrad
2007-06-07	Service Levels for Root Zone Management	CENTR Meeting: Helsinki, Finland	Kim Davies
2007-06-04	Service Levels for Root Zone Management	APTLD: Dubai, United Arab Emirates	Kim Davies
2007-05-10	IANA Update	RIPE 54: Tallinn, Estonia	Leo Vegoda
2007-05-08	Public Data Network Numbers Registry	RIPE 54: Tallinn, Estonia	Leo Vegoda
2007-04-24	IANA Update	ARIN XIX: San Juan, Puerto Rico	Leo Vegoda
2007-04-03	IANA Status Report	UKNOF Meeting: Manchester, United Kingdom	Leo Vegoda
2007-03-27	Root Management Updates for ccTLD Managers	ICANN: Lisbon, Portugal	Kim Davies
2006-12-06	IANA Updates for ccTLD Managers	ICANN Meetings: S#227;o Paulo, Brazil	Kim Davies
2006-11-21	ccTLD Best Practices and Considerations	ICANN ccTLD Workshop: Dubai, United Arab Emirates	Naela Sarras
2006-11-20	Introducing IANA Root Management	ICANN ccTLD Workshop: Dubai, United Arab Emirates	Naela Sarras
2006-11-14	What's Happening at IANA and ICANN?	APTLD: Bangkok, Thailand	Kim Davies
2006-10-25	ccTLD Best Practices and Considerations	ICANN ccTLD Workshop: Sofia, Bulgaria	Kim Davies
2006-10-25	Introducing IANA Root Management	ICANN ccTLD Workshop: Sofia, Bulgaria	Kim Davies
2006-10-11	Brief IANA Update	ARIN XVIII: St Louis, USA	Barbara Roseman
2006-10-10	What's happening at IANA and ICANN?	CENTR: Toronto, Canada	Kim Davies
2006-10-05	Brief IANA Update	RIPE 53 Plenary: Amsterdam, Netherlands	Kim Davies
2006-10-05	Brief IANA Update	RIPE DNS Working Group: Amsterdam, Netherlands	Kim Davies
2006-10-04	Introducing IANA	WSIS Seminar: Riga, Latvia	Kim Davies
2006-10-04	Internationalised Domain Names	WSIS Seminar: Riga, Latvia	Kim Davies
2006-10-01	Technical Policy for Root Zone Management	CENTR Technical Workshop: Amsterdam, Netherlands	Kim Davies
2006-09-13	Global IPv6-related Organizations	CITEL: Buenos Aires, Argentina	David Conrad
2006-09-08	IANA Status Update	APNIC: Kaohsiung, Taiwan	Barbara Roseman
2006-07-12	IANA Status Update	IETF 66: Montreal, Canada	Barbara Roseman
2006-06-28	Redelegations	ICANN: Marrakech, Morocco	Kim Davies
2006-06-27	IANA Update	ICANN: Marrakech, Morocco	Kim Davies
2006-06-23	IANA Root Zone Management Process	ICANN Meetings: Marrakech, Morocco	David Conrad
2006-06-22	Root Zone Changes and Redelegations	AFTLD: Marrakech, Morocco	Kim Davies
2006-06-22	Introducing IANA Root Management	PACNOG: Apia, Samoa	Kim Davies
2006-06-22	ccTLD Best Practices and Considerations	PACNOG: Apia, Samoa	Kim Davies
2006-05-26	IANA Update	CENTR General Assembly: Madrid, Spain	Kim Davies

Date	Title	Event	Author
2006-04-11	IANA Status Update	ARIN XVII: Montréal, Canada	David Conrad
2006-03-27	IANA Developments	ICANN Meetings: Wellington, New Zealand	Kim Davies
2006-03-26	IANA Update	APTLD: Wellington, New Zealand	Kim Davies
2006-03-02	Changes in IANA Service	CENTR General Assembly: London, United Kingdom	Kim Davies
2006-03-02	IANA Status Report	APNIC Meeting: Bali, Indonesia	Leo Vegoda
2006-02-08	IANA and its meaning for ccTLDs	Domain Pulse: Berlin, Germany	Kim Davies
2005-11-28	Introduction and Observations	ICANN Meetings: Vancouver, Canada	Kim Davies
2005-11-22	IANA Update	CENTR General Assembly: Amsterdam, Netherlands	Kim Davies

Exhibit M

CIVIL ACTION NOS. 00-2602-RCL; 00-2601-RCL; 01-1655-RCL;
02-1811-RCL; 08-520-RCL; 14-648-RCL; 08-502-RCL

**gTLD Applicant
Guidebook**
Version 2012-06-04



4 June 2012

Preamble

New gTLD Program Background

New gTLDs have been in the forefront of ICANN's agenda since its creation. The new gTLD program will open up the top level of the Internet's namespace to foster diversity, encourage competition, and enhance the utility of the DNS.

Currently the namespace consists of 22 gTLDs and over 250 ccTLDs operating on various models. Each of the gTLDs has a designated "registry operator" and, in most cases, a Registry Agreement between the operator (or sponsor) and ICANN. The registry operator is responsible for the technical operation of the TLD, including all of the names registered in that TLD. The gTLDs are served by over 900 registrars, who interact with registrants to perform domain name registration and other related services. The new gTLD program will create a means for prospective registry operators to apply for new gTLDs, and create new options for consumers in the market. When the program launches its first application round, ICANN expects a diverse set of applications for new gTLDs, including IDNs, creating significant potential for new uses and benefit to Internet users across the globe.

The program has its origins in carefully deliberated policy development work by the ICANN community. In October 2007, the Generic Names Supporting Organization (GNSO)—one of the groups that coordinate global Internet policy at ICANN—formally completed its policy development work on new gTLDs and approved a set of 19 policy recommendations. Representatives from a wide variety of stakeholder groups—governments, individuals, civil society, business and intellectual property constituencies, and the technology community—were engaged in discussions for more than 18 months on such questions as the demand, benefits and risks of new gTLDs, the selection criteria that should be applied, how gTLDs should be allocated, and the contractual conditions that should be required for new gTLD registries going forward. The culmination of this policy development process was a decision by the ICANN Board of Directors to adopt the community-developed policy in June 2008. A thorough brief to the policy process and outcomes can be found at <http://gnso.icann.org/issues/new-gtlds>.

ICANN's work next focused on implementation: creating an application and evaluation process for new gTLDs that is aligned with the policy recommendations and provides a clear roadmap for applicants to reach delegation, including Board approval. This implementation work is reflected in the drafts of the applicant guidebook that were released for public comment, and in the explanatory papers giving insight into rationale behind some of the conclusions reached on specific topics. Meaningful community input has led to revisions of the draft applicant guidebook. In parallel, ICANN has established the resources needed to successfully launch and operate the program. This process concluded with the decision by the ICANN Board of Directors in June 2011 to launch the New gTLD Program.

For current information, timelines and activities related to the New gTLD Program, please go to <http://www.icann.org/en/topics/new-gtld-program.htm>.

in this context. There will be no presumption that such objections or comments would prevent a score of 2 or lead to any particular score for "Opposition." To be taken into account as relevant opposition, such objections or comments must be of a reasoned nature. Sources of opposition that are clearly spurious, unsubstantiated, made for a purpose incompatible with competition objectives, or filed for the purpose of obstruction will not be considered relevant.

4.3 Auction: Mechanism of Last Resort

It is expected that most cases of contention will be resolved by the community priority evaluation, or through voluntary agreement among the involved applicants. Auction is a tie-breaker method for resolving string contention among the applications within a contention set, if the contention has not been resolved by other means.

An auction will not take place to resolve contention in the case where the contending applications are for geographic names (as defined in Module 2). In this case, the applications will be suspended pending resolution by the applicants.

An auction will take place, where contention has not already been resolved, in the case where an application for a geographic name is in a contention set with applications for similar strings that have not been identified as geographic names.

In practice, ICANN expects that most contention cases will be resolved through other means before reaching the auction stage. However, there is a possibility that significant funding will accrue to ICANN as a result of one or more auctions.¹

¹ The purpose of an auction is to resolve contention in a clear, objective manner. It is planned that costs of the new gTLD program will offset by fees, so any funds coming from a last resort contention resolution mechanism such as auctions would result (after paying for the auction process) in additional funding. Any proceeds from auctions will be reserved and earmarked until the uses of funds are determined. Funds must be used in a manner that supports directly ICANN's Mission and Core Values and also allows ICANN to maintain its not for profit status.

Possible uses of auction funds include formation of a foundation with a clear mission and a transparent way to allocate funds to projects that are of interest to the greater Internet community, such as grants to support new gTLD applications or registry operators from communities in subsequent gTLD rounds, the creation of an ICANN-administered/community-based fund for specific projects for the benefit of the Internet community, the creation of a registry continuity fund for the protection of registrants (ensuring that funds would be in place to support the operation of a gTLD registry until a successor could be found), or establishment of a security fund to expand use of secure protocols, conduct research, and support standards development organizations in accordance with ICANN's security and stability mission.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Jenny Rubin, et al.)
)
)
Plaintiffs,)
)
) CIVIL ACTION NO. 01-1655-RCL
v.)
)
)
The Islamic Republic of Iran, et al.)
)
)
Defendants.)

Susan Weinstein, et al.)
)
)
Plaintiffs,)
)
) CIVIL ACTION NO. 00-2601-RCL
v.)
)
)
The Islamic Republic of Iran, et al.)
)
)
Defendants.)

Seth Charles Ben Haim, et al.)
)
)
Plaintiffs,)
)
) CIVIL ACTION NO. 02-1811-RCL
v.) CIVIL ACTION NO. 08-520-RCL
)
)
)
The Islamic Republic of Iran, et al.)
)
)
Defendants.)

Ruth Calderon-Cardona, et al.)
)
)
Plaintiffs,)
)
)
v.)
)
)
Democratic People's Republic of Korea, et)
al.)
)
)
Defendants.)

MISC. NO. 14-648-RCL

Mary Nell Wyatt, et al.)
)
)
Plaintiffs,)
)
)
v.)
)
)
Syrian Arab Republic, et al.)
)
)
Defendants.)

CIVIL ACTION NO. 08-502-RCL

Shaul Stern, et al.)
)
)
Plaintiffs,)
)
)
v.)
)
)
The Islamic Republic of Iran, et al.)
)
)
Defendants.)

CIVIL ACTION NO. 00-2602-RCL

[PROPOSED] ORDER

Upon consideration of Plaintiffs' Motion for Six Month Discovery Period, Nonparty Internet Corporation for Assigned Names and Numbers' Brief in Opposition thereto, any reply, and counsel's oral argument, it is hereby:

ORDERED that Plaintiff's Motion for Six Month Discovery Period is **DENIED**.

IT IS SO ORDERED.

Dated: _____

United States District Judge