



VERISIGN™

July 11, 2013

12061 Bluemont Way
Reston, VA 20190
t: 703-948-3200

VerisignInc.com

VIA FEDERAL EXPRESS AND EMAIL

Christine Willett
New gTLD Program
Internet Corporation for Assigned Names and Numbers
12015 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

RE: Verisign's Implementation of the new IDN.IDN Transliterations of .com and .net

Dear Ms. Willett:

Over the past several months we have continued to refine our IDN.IDN implementation plans for the transliterations of .com and .net. We wanted to provide ICANN with more detail about our IDN.IDN plans in view of the public comments directed to ICANN and as I discussed with Akram Atallah on April 10, 2013.

In considering our strategy to implement our new IDN gTLDs, we sought to achieve several objectives but chief among them was, where feasible, to avoid costs to consumers and businesses from purely defensive registrations in these new TLDs as well as to avoid end-user confusion. With these important objectives in mind, we note that under Appendix 6 of our .com and .net Registry Agreements, all "Tagged Domain Names" (defined as labels with hyphens in the third and fourth character positions) in these two TLDs are in a reserved status until such time that valid internationalized names are registered. This principle is embodied in our updated TLD implementation plans where only valid IDNs in their ASCII encoding (e.g., "xn--ndk061n") may be registered as within the .com TLD and .net TLD. In this way, a registrant in one of our new IDN TLDs, or a registrant of an IDN.com or IDN.net, will have the sole right, subject to applicable rights protection mechanisms, but *not be required* to register the second level name across all or any of our IDN TLDs, including the .com or .net TLDs as applicable. We think this will be an important benefit to the community and

we expect strong support from brands and others with our plan. In order to illustrate our approach, we have identified two use cases below:

Use Case No. 1: Bob Smith already has a registration for an IDN.net second level domain name. That second level domain name will be unavailable in all of the new .net IDN TLDs except to Bob Smith. Bob Smith may choose not to register that second level domain name in any of the new transliterations of the .net TLDs.

Use Case No. 2: John Doe does not have a registration for an IDN.com second level domain name. John Doe registers a second level domain name in the Thai transliteration of .com but in no other .com IDN TLD or the .com registry. That second level domain name will be unavailable in all other transliterations of .com IDN TLDs and in the .com registry unless and until John Doe (and only John Doe) registers it in another .com IDN TLD or in the .com registry.

We will accomplish this primarily through validation rules and registration policies. As you know, under the current IDN framework, IDNs may be registered by potential registrants only if the domain name passes through a series of validation rules, each of which are described in our IDN applications. In order to effectuate our IDN implementation plans, our updated registration policies and validation rules will require that each second level name in one of the IDN TLDs has the same registrar, registrant and nameservers. Clearly, our policies and validation rules are more detailed, and we would be happy to provide whatever level of detail you or the community would like. It is worth noting, however, that even though the IDNs will be related in this manner, each IDN TLD, as well as the .com or .net TLD as applicable, will always be operated as separate registries and will not be linked to each other in any way other than through registration policies. Each TLD will have its own EPP commands, its own registration life cycle and its own WHOIS database.

There are also a few additional points. First, should there ever be a need to redelegate one or more of the IDN TLDs, under this approach Verisign would be able to reassign any of the IDN TLDs without impacting the remaining IDN TLDs from a technical perspective. Any new registry operator of the

Christine Willett

June 11, 2013

Page 3 of 3

reassigned IDN TLD may employ a variety of methods in order to maintain the approach described above.

Second, registrars will not be required to be operational for all of the IDN TLDs and the .com TLD and .net TLD. A registrar may choose to offer only one, or just a few, of the IDN TLDs and/or the .com TLD and/or .net TLD. A registrant would need to select a registrar that provides the services for the TLDs they need.

Finally, we continue to study our pricing models for this new and innovative product set. Verisign's IDN applications currently envision a specific flat price point, but as our market research matures and is finalized, we may launch the IDN TLDs at a different price point. We will notify you once our pricing determinations have been finalized.

Verisign intends to shortly initiate a broad communications plan to educate and inform our community about our IDN implementation planning. If you have any questions, please contact me at pkane@verisign.com or (703) 948-3349.

Sincerely,



Patrick S. Kane
Senior Vice President
Naming Services
VeriSign, Inc.

Cc:

Akram Atallah, President, Generic Domains Division
Cyrus Namazi, Vice President, DNS Industry Engagement