

**From:** Brian Huseman  
**Date:** 19 April 2019  
**To:** Cherine Chalaby

**Subject: Reply to ACTO April 18 Email**

Dear Chairman Chalaby,

I write to respond briefly to ACTO's April 18 letter to you.

As noted in our April 17 email to you, Amazon still has not been directly and explicitly asked by ACTO for an extension of time. Notwithstanding that, Amazon takes this opportunity to formally and respectfully oppose ACTO's request for an extension of time. Such an extension of time was not made in line with the Board's March 10 resolution outlining a timeframe and process, nor is warranted now given the dispute has been pending for 7 years.

Further, upon a quick initial review, the proposed PIC submitted by ACTO fails to take into account the nature and character of a .brand TLD and would strip the .AMAZON TLDs of its distinctiveness and deprive Amazon of significant uses of its applied-for TLDs. Indeed, it seems that core aspects of the proposed PIC are contrary to international intellectual property law, raise substantial security concerns, and are otherwise impractical and inappropriate.

Since this matter's inception, Amazon has listened closely to ACTO's and its member states' concerns, and Amazon's proposal, submitted to you on April 17, was amended over time to respect and address those concerns.

Amazon looks forward to the ICANN Board's consideration of Amazon's proposal in the coming weeks.

Sincerely,

Brian