



December 22, 2017

Mr. John O. Jeffrey
General Counsel and Secretary
ICANN
12025 Waterfront Dr., Suite 300
Los Angeles, CA 90094

Via email: john.jeffrey@icann.org

Ms. Karla Hakansson
Director, Registry Services
ICANN - Global Domains Division
12025 Waterfront Dr., Suite 300
Los Angeles, CA 90094

Via Email: Karla.hakansson@icann.org
and registryservice@icann.org

Dear Mr. Jeffrey and Ms. Hakansson:

RE: Release of single-character domain for .COM for RSEP ID: B6H5U-2X7N1

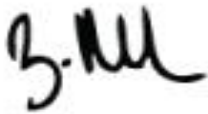
I write to you on behalf of members of the Internet Commerce Association. Founded in 2006, the Internet Commerce Association (ICA) is a non-profit trade organization representing domain name investors, website developers and related companies. The ICA is made up of responsible businesses and individuals who have joined together to improve public confidence in Internet commerce. Based in Washington D.C., the ICA's mission is to assist with the development of domain name related policy and to advocate for fairness in government policy and regulation.

We have taken note that by letter dated, December 14, 2017, the Department of Justice has advised ICANN that it does not intend to open an investigation into the proposed auction described in the Request for New Registry Services submitted by Verisign, Inc. dated November 30, 2017, and bearing Proposal No. 2017038 (the "Proposal").

In our view the Proposal requires a material change to a Registry Agreement as understood by Implementation Note 5 of Registry Services Evaluation Policy since there are material changes with respect to pricing, renewals, and the availability of single letter .COM domain names. As such, we understand that this matter will be referred to the ICANN Board for consideration and therefore kindly request your confirmation of same. Further, we ask for your confirmation that the circumstances of this Proposal are such that any Amendment to the .COM Registry

Agreement will be posted for a Public Comment Period, particularly because; a) this Proposal potentially sets a new precedent; b) has a substantial effect on third parties, including intellectual property owners who may have trademark rights corresponding to the .COM domain name to be auctioned, and to domain name registrants who have an interest in the creation of any new purported pricing and availability models in a legacy TLD.

Yours truly,
INTERNET COMMERCE ASSOCIATION

A handwritten signature in black ink, appearing to read "Z. Muscovitch".

Per:

Zak Muscovitch
Interim General Counsel