

nameshop

Dear Christine Willett,

As we stated on an earlier occasion, we carefully read your letter dated April 5, 2019, where ICANN claimed that there are no avenues for ICANN to revisit ICANN's omissions in evaluation and reconsideration of the .Internet TLD application. In response to your letter of April 5, Nameshop responded with its objections to ICANN's claim by letter sent on April 25, 2019 to point out:

- ICANN did NOT follow the avenues provided in 1) the Applicant Guide Book and that of the 2) Change Request process which amended the AGB.
- Instead, ICANN skipped provisions and processes to discriminate against this application for .Internet
- The Board Governance Committee restricted its review of the Nameshop reconsideration request only an examination of process, and not of the substance of the issues and the merits of the application. Even within that limited scope, the BCG did not address the processes skipped and the discrimination in process.
- The Ombudsman's attention was incomplete and on various occasions when Nameshop requested a fair and complete review, the Ombudsman limited is review to process and not substance and it is the substance where most of the unfairness occurred.

The GDD's hesitancy to address these issues that compromise the integrity of the process has brought us to this state where "further avenues" for examination is claimed to not exist.

The Nameshop letter addressed to the Board Chair and CEO dated June 23, 2019 pointed out these limitations in the ICANN process in greater detail.

It is contextually pertinent to point out that various published ICANN records of community / industry observations clearly indicate that there is a need for the reconsideration processes to conduct reviews beyond mere process gaps. GDD has indeed participated in these various discussions and could take into consideration the changes that provide an appropriate level of

due process and fairly treat the case of Nameshop in a timely manner without awaiting formal recommendations which may take time in the ICANN staff and Board processes.

As Nameshop's application for the TLD .Internet has already suffered seven years of delay, it would be fair to allow Nameshop to request the Board to review its Request for Consideration and go beyond the flow of process, and into the merits and value of this application for . Internet awaiting delegation for seven years.

Thank you.
Sivasubramanian M

November 3, 2019
Montreal

Contact Information Redacted