



**Statement from the Internet Infrastructure Coalition (i2Coalition)**

**Regarding .AMAZON**

**October 31, 2017**

Dr. Steven Crocker  
Board of Directors Chair  
Internet Corporation for Assigned Names and Numbers (ICANN)  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

Cc: ICANN Board of Directors

Dear Dr. Crocker & ICANN Board of Directors:

The i2Coalition is a membership organization composed of the world's leading Internet infrastructure companies. Our diverse membership includes the registrar and registry community, but extends wider to represent the diverse Internet infrastructure ecosystem. Our goal at ICANN is to provide a voice for underrepresented parts of that ecosystem— in particular web hosts, data centers, and cloud infrastructure providers. On behalf of that community, we wish to make a statement in support of Amazon's gTLD application for .AMAZON, as well as their Chinese and Japanese variations.

The ruling of the ICANN Board New gTLD Program Committee (NGPC) on May 14, 2014 regarding .AMAZON had a troubling effect in the Internet infrastructure community, leading to an erosion of trust in the overall 2012 gTLD Applicant Guidebook process, and through that the way in which contracted parties engage in the multi-stakeholder process. We were encouraged by the findings of the IRP that unanimously found that the Board needs to re-examine its decision in order to meet its obligations under its Articles, Bylaws, and Guidebook. Though as a community, we are sympathetic to the position of the governments of Brazil and Peru, we are also impressed with the extensive efforts that Amazon has undertaken in order to assuage as many of those concerns as possible.

Should another gTLD process happen in the future, a reversal in the .AMAZON decision will help to ensure that the .AMAZON ruling does not prove a chilling effect to an Internet



infrastructure community that is fearful of entering into a process that has proven to have unpredictable and non-transparent outcomes. Enhancing the predictability and transparency of the gTLD application process is critical to ICANN's continuing global legitimacy, particularly given that ICANN has historically favored alternative dispute resolution mechanisms and also required contracted parties to waive the rights to file a suit in court. Without certainty that ICANN will rigorously follow bottom up processes and policies, contracted parties may see little reason to enter into an agreement that requires them to waive their rights to bring legal claims into a court of law.

Our interest in this matter goes well beyond the commercial interest of a single member of our community. We strongly believe that the Board of ICANN now has an opportunity to show the entire multistakeholder community that ICANN stands by its Applicant Guidebook, its community-developed Bylaws, and independent dispute resolution process. The Board's approval of the .AMAZON applications will increase community trust, and show that the Board takes ICANN's core principles of transparency and accountability extremely seriously. For those reasons, our community strongly believes that the Board should approve the .AMAZON applications.

Sincerely,

Jay Sudowski & Christian Dawson

Co-chairs of the ICANN Working Group; i2Coalition