New sTLD RFP Application

.tel-Telnic

Part B. Application Form

Name and Address fields

Company/Organization Information

Company Name	Telnic Limited
Company Address 1	8 Wilfred Street
Company Address 2	n/a
Company City	London
Company State/Province	n/a
Company Postal Code	SW1E 6PL
Company Website Address	www.telnic.com
Company Country	United Kingdom

Sponsoring Organization Information

Sponsoring Organization Name	Telname Limited
Sponsoring Organization Address 1	8 Wilfred Street
Sponsoring Organization Address 2	n/a
Sponsoring Organization City	London
Sponsoring State/Province	n/a
Sponsoring Organization Postal Code	SW1E 6PL
Sponsoring Organization Country	United Kingdom
Sponsoring Organization Website Address	www.telname.com

Namestrings and Conventions

First sTLD choice:	.tel
Naming Conventions:	

2.1. First sTLD choice

.tel

2.2. Naming conventions

.Tel domain names will be registered at the second-level of the sTLD.

The Sponsoring Organization will define and implement policies concerning
naming restrictions of the sTLD. Digits are to be restricted to maintain the
integrity of a letters/words based top-level domain and to avoid interference
with established or future national and international telephone numbering
plans.

2.3. The .Tel is

The .Tel is a text-based naming and navigation sTLD that addresses the unique
needs of the fixed-line and wireless Internet-Communications namespace. This
namespace covers any form of intercommunications activity (voice, combined
voice/data, or messaging) between individuals and/or businesses, which is
dependent, in part or whole, on the Internet as the means of transport.
Hereinafter, this environment is referred to as the "Internet-Communications"
namespace.

This new sTLD will be:

* A vehicle that will allow and encourage individuals and corporations to
manage a universal identity in this namespace.

* A catalyst and enabler for new innovative voice/data communications services,
products, and related content for this namespace.

* Neutral to all existing Internet-Communications devices, technologies,
network interfaces and fully compliant with all related standards.

* A unifying naming structure for Fixed/Mobile Convergence (FMC) that will
provide seamless voice, data and value added services for both the wireless and
fixed-line networks.

* Key to broad end user acceptance and growth for Internet-Communications
services and related content.

2.4. What does the .Tel solve?

As Internet-Communications expands, it is highlighting the shortfalls of
traditional telecommunications numbering to meet new demands. Traditional
telephone codes and numbers will remain critical long into the future for
conventional needs. However, they have reached a threshold and are unable to
migrate naturally to the new Internet-centric communications world.

The advance of the Internet and Internet Protocol (IP) technology in
telecommunications is resulting in the Internet playing a more important role
in the creation and delivery of voice/data services. Increasingly, new services
and applications in the communications field are looking to the Internet for

growth.

Powerful new trends are beginning to demand a text-based
Internet-Communications sTLD:

2.4.1. Technology trends

* Person-to-person communications has traditionally been dependent on circuit
switched technology. However, global digitalization is showing how IP based
technologies are significantly more flexible, cost-effective, and practical for
transporting all forms of communications, including person-to-person voice
services.

* High-speed broadband access to the Internet is also driving IP penetration in
communications. This is partly due to the increased quality of broadband
access, low-prices and competitive service offerings.

2.4.2. Device trends

* Wireless and new-generation fixed-line communications devices are becoming
Internet-enabled to provide the efficiencies and advantages that IP based
technology, content and services bring. This trend will be further enhanced by
the Fixed/Mobile Convergence (FMC).

* Furthermore, these new devices will require a text based naming structure to
fulfill their potential. Just as the DNS played a pivotal role in the
development of an easy to use and remember naming structure for the traditional
large-screen Internet, exactly the same will apply to the world of
Internet-enabled communications devices, whether wireless or fixed-line.

2.4.3. User trends

User trends are demanding richer content and a simplified universal
communication identifier.

2.4.3.1. Rich content

Communications is moving from a one-dimensional simple voice oriented world,
into a multi-dimensional and rich IP based communications environment that
provides scope for exciting new content. However, end users need this content
to be easily accessed through a DNS text based naming and navigation structure,
which is presently unavailable.

2.4.3.2. Universal communication identifier

End users are finding it increasingly difficult to remember and manage their
own and other people's communication identifiers, including:

* home telephone numbers

* mobile telephone numbers

* home fax numbers

* personal email addresses

* pager numbers

* work telephone numbers

* work telephone extension numbers

* work email addresses

* work fax numbers

* instant messaging addresses

* and other contact information

Hence, there is a need for a universal text based communication identifier under which the end user can store all their contact information.

2.4.4. Industry trends

In the absence of a standard text-based solution for Internet oriented communications, rival and alternative text-based communications naming systems will occur, causing fragmentation in the industry. These systems will be provider-centric, and will inevitably result in even more confusion, conflicting policies, lack of regulation, "ring-fencing" of users and problems with portability as well as interoperability.

The case is conclusive for a new ICANN Internet-Communications sTLD that is standalone and, importantly, neutral to network interfaces and compliant to ENUM, the PSTN and SS7 services.

2.5. How is the .Tel used?

Individuals could use their name as a personal "brand" or a universal identity accessible from any Internet-enabled communications device to publish their contact information or other personal data. For example, Adam Smith could develop a personal mini-website that provides general information about himself including his contact information, such as phone numbers, and email addresses. Adam would be able to update and manage this data at will, and Adam's friends, when trying to reach him, could simply check adamsmith.tel to find his most current contact information and connect the call or send a text message.

The business market has different needs than the individual market. Businesses are primarily concerned with customer acquisition and retention, ease of client communication, and efficiency of customer management. The .Tel domain has been conceived to meet each of these needs fully. Hertz, for example, could purchase hertz.tel and design a simple and clear navigational system for customers accessing the company via Internet-enabled communications devices. Hertz could segment the customer by geographic location and department and then route the customer to the appropriate call center, which enhances the customer experience and provides the most efficient and cost effective solution for Hertz.

2.6. Why the .Tel string?

The proposed .Tel is internationally understood and existing TLDs cannot meet the requirements of the Internet-Communications namespace.

2.6.1. The word "Tel" is internationally understood

* The word "Tel" is internationally understood, with a broad and global meaning, denoting a realm of communications services over voice-oriented devices. As the .Tel sTLD serves the hybrid telephony-Internet community, the marketplace will rapidly adopt the .Tel string to identify services and content

relating to this space.

2.6.2. Current gTLDs and ccTLDs are limited in serving the appropriate
community

* Current ccTLDs and gTLDs do not and cannot adequately serve the
Internet-Communications namespace. Existing TLDs are dedicated to the legacy
Internet, while ccTLDs serve restricted geographic areas. To use established
TLDs in this namespace requires the unsatisfactory use of either third-level or
sub-domain registrations under existing second-level domains. The resulting
fragmentation and customer confusion could continue to impede the growth of
this high-potential namespace. Therefore, a dedicated .Tel string is an
essential component for the future of this community.

Second sTLD choice:	.tel
Naming Conventions:	

3.1. Second sTLD choice

.tel

3.2. Naming Conventions

.Tel domain names will be registered at the second-level of the sTLD.

The Sponsoring Organization will define and implement policies concerning
naming restrictions of the sTLD. Digits are to be restricted to maintain the
integrity of a letters/words based top-level domain and to avoid interference
with established or future national and international telephone numbering plans.

Third sTLD choice:	.tel
Naming Conventions:	

3.3. Third sTLD choice

.tel

3.4. Naming Conventions

.Tel domain names will be registered at the second-level of the sTLD.

The Sponsoring Organization will define and implement policies concerning
naming restrictions of the sTLD. Digits are to be restricted to maintain the
integrity of a letters/words based top-level domain and to avoid interference
with established or future national and international telephone numbering plans.

Sponsoring Organization Structure

4.1. Executive Summary

This proposal follows Telnic's sTLD application to ICANN in October 2000. At
that time, Telnic's application was: (i) the only pure text-based proposal in
the communications group of applicants, and (ii) a proposal that did not
conflict with any telephone numbering plan. This unique approach was reviewed

positively in ICANN's subsequent reconsideration process in 2001. This current 2004 sTLD application builds upon these important issues.

Telnic Limited, the applicant, if selected by ICANN, proposes to form a Sponsoring Organization, Telname Limited (hereinafter referred as the "SO"), as a for-profit company, that will enter into an agreement with ICANN to act as the sTLD Registry.

The SO will establish a text-based naming and navigation oriented sTLD that addresses the unique needs of the fixed-line and wireless Internet-Communications namespace.

Telnic, the founding entity of the SO, is a respected member of the Internet-Communications community and currently chairs the mobile TLD group of the Universal Mobile Telecommunications System Forum (UMTSF).

Telnic has established all necessary financial resources needed to ensure the stability of the new SO organization. Furthermore, Telnic has developed a proof-of-concept prototype to demonstrate the robustness, scalability and power of the proposed .Tel domain. A technical demonstration of this system is available to ICANN upon request.

To best address the needs of the community and to ensure community participation and influence, the SO proposes to establish the Policy Advisory Group (hereinafter referred to as the "PAG"), to represent the community and formulate all policies relating to the sTLD operations.

4.2. Mission

The Sponsoring Organization is devoted to the promotion of the .Tel sTLD for the benefit of the Internet-Communications community. Furthermore, the SO is dedicated to the advancement of the DNS in the field of Internet-Communications.

4.3. Organization

The SO will have four main functions, which will be carried out by its staff, subject to the direction of its Board of Directors:

* Technical Operations

The technical staff will be responsible to liaise with the Registry Operator to oversee Registry Operations.

* Financial Operations

The financial staff will oversee all internal SO financial operations and coordinate revenue collection with the appropriate registrar and Registry Operator staff.

* Marketing and Promotion

The marketing staff will be responsible for: promotion, marketing, outreach, and education. This will include direct promotions and coordination with registrars on joint marketing campaigns.

* Policy Coordination

The policy staff will work with the PAG and the Registry Operator to ensure implementation and enforcement of approved policies.

4.4. The Community to be served

The .Tel Community consists of individuals and/or businesses who wish to have a universal identity, brand or name, in the Internet-Communications space as well as providers of Internet-Communications services and related content. This Internet-Communications namespace covers any form of intercommunications activity (voice, combined voice/data or messaging) between individuals and/or businesses, which is dependent, in part or whole, on the Internet as the means of transport.

The .Tel needs to be sponsored to ensure digits are restricted to maintain the integrity of a letters/words based Top Level Domain and to avoid interference with established or future national and international telephone numbering plans.

4.5. Ensuring stakeholder interests and participation

A key aim of the SO is to ensure that the .Tel sTLD implementation reflects the interests of the community stakeholders. Therefore, the SO will engender active and positive participation by community stakeholders and the Internet at large.

The primary component to ensure operations are in accordance with the interests of the stakeholders of the community and the Internet at large will be the PAG. The cornerstone PAG will provide stakeholder access and influence to the policies that govern the operation of the .Tel sTLD. This body will operate under the full scrutiny of the community.

All operations will be accountable, transparent, and inclusive of the community, with the following designations:

* Develop policies through consultation and comments from the Internet-Communications community.

* Provide open and timely information via an SO web site.

* Ensure accessibility to stakeholders via effective mechanisms such as user-groups and policy advisory activities.

Telnic Limited has received letters of support from leading members of the Internet-Communications community. These members approve the issuance of the .Tel sTLD as they believe it will benefit the entire industry. These letters of support are available to ICANN upon request.

4.6. Sponsoring Organization detailed structure

Upon ICANN's acceptance of the proposed .Tel sTLD, the Sponsoring Organization will be incorporated as a for-profit company.

Telnic believes that a for-profit organization constitutes the most appropriate and financially stable model to fulfill both the public interest criteria, as well as meet the necessary investment requirements to ensure an efficient, secure, and stable .Tel sTLD. Additionally, this legal structure is an incentive for the SO to perform, and consequently, it reinforces the success and stability of the proposed sTLD.

The SO will comprise two principle bodies:

* The Board of Directors

* The Policy Advisory Group (PAG)

4.6.1. The SO Board of Directors

The Board of Directors will be the ultimate decision-making body that will approve administrative, operational and policy issues. There will be a minimum of five Board members. The majority of Board members will be appointed by the shareholders. Two Board members will be appointed by the PAG.

4.6.2. The PAG

The PAG will consist of members who will be drawn from a cross-section of the community. The PAG will be delegated the entire responsibility for defining and formulating all .Tel sTLD policy recommendations for consideration and approval by the SO Board of Directors. The PAG will represent the interests of the community. An extensive PAG summary follows in the 'Representation' section.

4.7. Conducting operations

In addition to the provisions detailed in the Memorandum and Articles of Association (available upon request), Telnic recognizes that there are wider Internet-related policy issues that must be addressed on a continuous basis if it is to operate successfully in this namespace. When the SO is formed, the Board of Directors will establish the PAG as a vehicle to provide an open and ongoing dialogue with the sTLD community, as well as to liaise with ICANN and the broader Internet community in order to best advise the SO Board in respect to industry solutions and policy formation.

4.8. Policy formulation activities

The SO will have three primary responsibilities:

* Policy Development: to develop the policies that govern the use and deployment of the sTLD through the PAG.

* Stable and Secure Implementation: to ensure and oversee proper implementation and a large scale roll-out of the sTLD concept through its selected partners in a stable and secure manner.

* Representation: to ensure that the interests of the community are represented, and that all policies and executive decisions related to the sTLD are made in an open and transparent manner.

In order to fulfill its responsibilities, the SO will request a delegation of policy authority from ICANN in matters related to the new sTLD, as detailed in the relevant subsequent sections. The SO will not modify key agreements and policies set in place by ICANN, including ICANN's Uniform Dispute Resolution Policy and ICANN's Accredited Registrar Policies.

Please refer to the 'Community to be Served' section for additional information relating to the SO, and to the 'Representation' section for further detail on the PAG.

Appropriateness of Sponsored TLD Community

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5.1. The Community to be served

The .Tel Community consists of individuals and/or businesses who wish to have a
universal identity, brand or name, in the Internet-Communications space, as
well as providers of Internet-Communications services and related content. This
Internet-Communications namespace covers any form of intercommunications
activity (voice, combined voice/data or messaging) between individuals and/or
businesses, which is dependent, in part or whole, on the Internet as the means
of transport.

The .Tel needs to be sponsored to ensure digits are restricted to maintain the
integrity of a letters/words based Top Level Domain and to avoid interference
with established or future national and international telephone numbering
plans.

5.2. Members of the SO community include:

5.2.1. Universal identity brand or name users

* The members consist of individuals or businesses, who wish to have a
universal identity, brand or name, in this namespace.

5.2.2. Service providers for the .Tel namespace

* The members consist of individuals or businesses that provide services or
applications for the .Tel namespace.

5.2.3. Related content providers for the .Tel namespace

* The members consist of individuals or businesses that provide related content
for the .Tel namespace.

* Related content is data that individuals or businesses provide to end users
to support voice communications purposes. Typically, this data includes:
photos, images, videos, music or contact information associated with voice
communications.

5.3. Why the defined community to be served is appropriate for the creation of
a sTLD

The Internet infrastructure is playing an increasing role in the delivery of
voice and data oriented communications services. Consequently,
Internet-Communications is developing into a mature industry with its own
distinct needs for expression. Yet it remains a community without a dedicated
sTLD.

The proposed .Tel sTLD will enable and facilitate the creation and access of
new IP centric services, products, and content related to this community,
thereby bringing the power of the DNS to a major underserved segment of the
global Internet. This will provide a universal text naming and navigation
structure that will allow any user, anywhere, to access these services and
related content from their Internet-enabled communications devices as easily as
content is accessed on the legacy Internet.

A proof-of-concept for the community was developed by Telnic in conjunction
with Roke Manor Research, a division of Siemens Corporation, to demonstrate the
power of an Internet-Communications centric Top Level Domain. Please visit
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www.telnic.com for a demonstration of this prototype. This work followed
similar successful proof-of-concept development with Ericsson. Overall, it has
provided a very good example of the power and the utility of text-based naming
and navigation for contact information and related content based on the
Internet platform.

A full description of the appropriateness of the .Tel sTLD is provided in
sections 2.4, 2.5 and 2.6 of this Part B.

5.4. The .Tel will:

* Deliver an easy to use and easy to remember intuitive letters/words based
solution, where numbering is restricted.

* Provide a text-based naming structure that will bridge the segmentation of
all Internet-Communications services and related content.

* Bring to this specific community, through the adoption of the DNS and ICANN
regulation, the Internet model of low barriers and non-discrimination of
entrants.

* Create a catalyst and an environment for the community to freely innovate and
realize new applications and value-added services.

* Produce a combined solution for both fixed-line and wireless networks
(Fixed/Mobile Convergence or FMC). A sTLD covering both fixed-line and wireless
communities is essential to avoid fragmentation between these two environments.

* Offer flexible deployment, thus providing the capacity to complement any
existing or future Internet technologies (IPv4, IPv6, etc.) and networks (GSM,
CDMA, 3G, WLAN, WAN, etc.).

5.5. The .Tel will not:

* Act as an alternate telephony addressing or dialing system.

* Conflict with IP addressing (IPv4 or IPv6), the PSTN or SS7 systems, or with
current or future ENUM implementations.

* Overlap or conflict with any existing top-level domain and their
value-chains.

* Allow numeric-only domains to be registered, and therefore will not conflict
with any national or international telephone numbering plan.

Representation

The SO recognizes that active participation in policy making of the .Tel sTLD
is critical. Therefore, the SO will encourage the participation of the
community in the policy making process, to ensure that the rules under which
the TLD is operated are to the benefit of the community.

As previously mentioned, Telnic Limited has received letters of support from
leading members of the Internet-Communications community. These members approve
the issuance of the .Tel sTLD as they believe it will benefit the entire
industry and have indicated an interest in participating in the PAG. These
letters of support are available to ICANN upon request.

6.1. Policy Advisory Group

6.1.1. Purpose

The Sponsoring Organization will establish the Policy Advisory Group (PAG). The PAG is the body responsible for community representation and policy formulation for the proposed sTLD.

The PAG will:

* Set the rules under which .Tel names are registered in the namespace.

* Operate within the SO to ensure that appropriate policies are developed for approval by the SO Board.

* Represent the interests of the community, consult with the community, and make it inclusive in the process of new policy development and any revisions of polices.

6.1.2. Functions

The principle functions of the PAG are:

6.1.2.1. To initiate policies

* To consider areas requiring policy development

* To solicit and review input from ICANN and the community

* To consider and develop policy proposals

* To publish policy proposals in the form of consultation papers to the community

* To administer community consultation

* To consider and respond to community views when forming policy

6.1.2.2. To formalize policies

* To determine all .Tel domain name registration policies

* To make policy recommendations to the SO Board

* To respond to any SO Board comments on policy issues

* To review if necessary any adopted policies or implementation decisions

6.1.2.3. To maintain the PAG

* To keep and publish proper and timely records

* To ensure proper PAG procedures

* To maintain independence and accountability

6.1.3. Level of authority

* The PAG level of authority is to propose to the SO Board all the policy rules under which names are registered in the namespace.

6.1.4. Coordination with the SO

* The PAG will coordinate with the SO Board through the PAG representatives sitting on the SO Board.

6.1.5. Policy making procedures

* Outline procedures to enact policies:

6.1.5.1. Initiate policy issues

The PAG will develop and initiate policy issues in a timely manner, while considering the views and input from:

* The Community

* The Sponsoring Organization Board

* ICANN

6.1.5.2. Community consultation

The PAG will carry out full community consultation to:

* Create and publish timely policy consultation papers

* Interact with the community on pending policy issues

* Review community feedback to set official PAG policy agendas

6.1.5.3. Formalizing policy recommendations

Formal PAG meetings will be convened to:

* Discuss and decide policies immediately after completion of the consultation process

* Make policy recommendations to the SO Board

6.1.5.4. SO Board Approval

The SO Board will formally consider PAG recommendations, which are then either:

* Accepted by a majority vote by the SO Board and implemented, or

* Not approved for stated reasons and returned to the PAG for reconsideration

The SO Board will be unable to overrule policy recommendations made by unanimous votes of the PAG unless the Board itself is unanimous in its decision.

6.2. Interim PAG

As defined in section B5, the .Tel community is broad and diverse, therefore an interim PAG will be formed with the purpose to:

* Formalize a Charter to govern the PAG

* Complete the first-stage policy initiatives for the sTLD

* Establish procedures and timeframes to create the permanent PAG, after which the interim PAG will be dissolved

The interim PAG's Chairperson will be Ms. Rita Rodin, a partner of Skadden, Arps, Slate, Meagher & Flom LLP & Affiliates in New York. In addition to Ms. Rodin, the interim PAG will consist of five independent recognized experts selected from the Internet-Communications community.

The interim PAG will be responsible for:

* Consulting with members of the Community

* Writing the PAG Charter that will define the workings of the PAG

* Establishing the permanent PAG

Observer status to monitor the work of the Interim PAG will be an entitlement open to ICANN.

6.2.1. Board participation

The composition of the permanent PAG will be established by the interim PAG in consultation with the SO Board.

Two interim PAG members will be selected immediately to sit on the SO Board.

6.2.2. Selection procedures

The interim PAG will define the selection procedures to establish the permanent PAG as described by the Charter.

6.2.3. Meetings

The interim PAG will meet as often as it deems appropriate.

Meeting notices, agendas, attendees, venue, and all other relevant information will be published on a dedicated website, adequately in advance of scheduled meetings, for community review.

The interim PAG will work to reach its policy recommendations by consensus.

6.2.4. Community consultation

Consultation periods will be given prior to all PAG meetings that will involve any form of policy-making decisions for recommendations that will be passed for approval.

Outline agendas, and consultation papers will be completed and published in advance on the SO website, and the community will be invited to submit comments and views on these documents. All responses will be considered and consolidated into a single document for review by PAG members prior to meetings. Meeting agendas and discussion items are open to change in order to reflect valid community input.

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6.2.5. Reporting

All PAG meetings will be minuted and published on the SO website. All other
related material and information will be systematically posted and made
available in an archived form to ensure full transparency and accountability.
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Openness and Tansparency

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Openness and transparency are integral goals that will permeate all areas of
the SO and PAG work. The interests of the Internet community at large will be
best served if the SO conducts its activities with as much access to
information about the organization's activities as possible, through open
mechanisms.

It is essential for the SO to encourage, primarily through the auspices of the
PAG, transparency to safeguard fairness and due process by providing the
community with an opportunity to know and contribute to all policy formulation.
To this end the PAG has a special role to play.

Accordingly, the proposed PAG code of conduct shall include:

* All matters before the PAG shall be open and transparent.

* The PAG shall provide information to the community on all policy initiatives
in the form of: website postings, press-releases, or other publicly accessible
notices.

* The community shall have the opportunity for timely participation in all PAG
policy formulations.

* Open and transparent processes shall equally extend to meetings of any
standing committees or sub-committees.

To further achieve the aims to conduct business openly and to be accountable, a
publicly accessible website will be used as a principle medium. The website
will include the following material:

* Comprehensive information on the SO.

* An open PAG sub-site whose content and management will be the responsibility
of the PAG. It will be stipulated that the PAG sub-site should provide complete
and comprehensive materials covering all its activities.

* Minutes involving PAG policy recommendations and decisions.

* SO Board meeting minutes specific to policy votes.

* Online links to company audits or other public information regarding the SO.

* Advanced information on meetings and relevant activities of concern to the
community.

* The PAG will operate in full public scrutiny and encourage community
participation. The SO website will be central to the collection and
dissemination of PAG and other non-confidential .Tel information.

* An interactive archive of SO and PAG material.
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* Press releases and notices will be posted on the site, as well as distributed to various other suitable media accessed by the community and the Internet at large.

The objective is to ensure access to key information and decision-making, and channels for the community to contribute to policy formulation.

Initial Directors, Officers, and Other Staff

Telnic has a qualified and highly experienced management team in business, financial, technical and marketing areas. If Telnic is successful with its current .Tel application, the following people will be holding senior positions in the SO.

NAME	AGE	POSITION
Juan Villalonga	50	Chairman
Khashayar Mahdavi	43	General Manager/CEO
Fabien Chalandon	51	VP CFO
Chris Brady	49	VP of Investor Relations
Alan Price	49	VP of Policy
Tim Griswold	59	VP of Business Development
Olivier Decrock	34	VP CTO
Benjamin Blumenthal	30	VP of Sales and Marketing

The SO intends to expand the employee base and further recruit employees with specialized skills as required. The SO has secured the necessary capital to do so upon a favorable decision from ICANN.

8.1. Juan Villalonga

Juan Villalonga is the Chairman of Telnic Limited. He has served as Chairman and Chief Executive Officer of Telefonica Group, Spain's principal telecom company. Prior to joining Telefonica, Mr. Villalonga headed the activities of Bankers Trust Company in Spain and Portugal. Mr. Villalonga was also Chief Executive Officer of CS First Boston in Spain. He began his career with McKinsey & Company, where he became a partner and was based at various times in the United States, Portugal, Italy and Spain. Mr. Villalonga is a Board Member of Banco Espirito Santo Group, Member of the Board of McLeod USA and also Member of the Advisory Board of Ben Gurion University. He holds a degree in law from Deusto University and an MBA from the IESE in Barcelona.

8.2. Khashayar Mahdavi

Khashayar Mahdavi is the CEO of Telnic. Mr. Mahdavi has spent the last nine years working as a financial advisor, specialized in corporate restructurings and start-up companies. He previously worked for eight years in the international department of Lazard Frères in Paris, where he led government advisory assignments, which included corporate reorganizations, privatizations, debt restructurings and bond offerings on the international capital markets. Mr. Mahdavi holds a degree in Business Administration from the Institut d'Etudes Politiques de Paris and an M.Phil in Economics from Oxford University.

8.3. Christopher D. Brady

Mr. Brady is Telnic's VP of Investor Relations and the co-founder and Chairman of The Chart Group. Mr. Brady is a Director of Bitrage, Inc, Optigas LLC and NWGH Ltd., holding company for New World Trust Co.; Vice Chairman of Hibernia

Capital Partners, Ltd. (Ireland), and serves on its Investment Committee. Mr. Brady also serves on the Investment Committee of Chart Capital Partners, L.P. Prior to the formation of Chart, Mr. Brady was a Partner with The Lodestar Group, a merger advisory and investment firm since merged into Société Générale; and spent eleven years in the Corporate Finance and Capital Markets Departments of Lehman Brothers and Dillon Read. Mr. Brady earned his B.A. from Middlebury College and his M.B.A. from Columbia University Graduate School of Business.

8.4. Fabien Chalandon

Mr. Chalandon is Telnic's Chief Financial Officer. He is also the co-founder of The Chart Group which was the incubator of Telnic in 1999-2000. Mr. Chalandon is a member of the Board of NWGH, Ltd., and sits on the Boards of several private equity funds and fund-of-funds in Europe and the U.S. For seven years, Mr. Chalandon ran a Paris-based family office, which he diversified into international private equity. Prior to that time, Mr. Chalandon was in the Investment Banking Groups of Lazard Freres (Paris) and Dillon Read (London). Mr. Chalandon has been awarded the French Legion d'Honneur and writes in different French daily newspapers on economic issues. Mr. Chalandon earned his MBA from HEC (Hautes Etudes Commerciales) in Paris.

8.5. Alan Price

Mr. Price is the co-founder of Telnic and its VP in charge of Policy Issues. Mr. Price is the Chairman of the mobile TLD group in the Universal Mobile Telecommunications System Forum (UMTSF) that has been responsible for the Mobile TLD whitepaper. He is recognized as an expert on numbering and addressing and has extensive experience in the UK and Europe advising major companies on numbering and addressing issues. Mr. Price was a founding member of CORE (Council of Registrars) with Networks UK, CORE being one of the original organizations behind the current top-level domain initiatives.

8.6. Tim Griswold

Mr. Griswold is Telnic's VP of Business Development. Mr. Griswold is a recognized wireless data expert with global experience. He was an early pioneer in e-commerce, launching his first online store in 1993. In the mid 90's, he co-invented a non URL-based browser that he licensed to AT&T and then sold. Mr. Griswold worked on two early-stage Internet start-ups and subsequently joined VeriSign in 2000, where he developed a new identity and navigation service for the wireless Internet. This included establishing a new global registry. Mr. Griswold has also worked for global technology leaders including ITT where he served as their Director of Product Support Technology. In that position, he re-engineered ITT's global service and support operations. At IBM, he managed the installation and operation of the largest network in the world at that time. Mr. Griswold is a frequent speaker at industry events including PCIA, CTIA, CommunicAsia in Singapore and China Telfex in Shanghai. He also gave the keynote address at the Inaugural International Kaitai (Wireless) Forum in Kyoto Japan in 2002. Mr. Griswold holds a Bachelor of Science in Business from Charter Oak College, Hartford Connecticut and has an MBA from Regis University.

8.7. Olivier Decrock

Mr. Decrock is Telnic's Chief Technology Officer. Prior to his joining Telnic, Mr. Decrock was CTO for e-Auction Room, a UK- based Internet start-up specialized in real-time online auction technology that broadcasted the Millennium Dome Auction in London. He was also CTO and board member of the

European Internet Shopping Robot Buycentral (acquired by Lycos Europe in 2003) where he developed the company technology. Mr. Decrock also worked for Electricité de France where he created an internal web subcontractor system focused on web site development, database hosting, gateway maintenance, and e-business. He studied at the Ecole Nationale Supérieure d'Informatique et de Mathématiques Appliquées de Grenoble, a division of the Institut National Polytechnique de Grenoble, from which he graduated with a degree in Software and Network Engineering.

8.8. Benjamin Blumenthal

Mr. Blumenthal is Telnic's VP of Sales and Marketing. Prior to his joining the Company, Mr. Blumenthal was Vice President of Bristol Investment Group, a New York city investment bank, and specialized in technology investments. Mr. Blumenthal also worked as a Client Strategist for HomeCom Communications, a leading Internet development company focused on web-enabled solutions for the financial services industry. In 1996, Mr. Blumenthal founded Capital Guidance Systems, one of the first online venture capital forums. He studied at Oxford University in England, has a BA from Emory University, and an MBA in Marketing from Goizueta Business School at Emory University.

Selection of Directors, Officers, Members, Staff

The complete Memorandum and Articles of Association are available upon request.

9.1. Eligibility and method of selection

The majority of the SO Board members will be selected and appointed by the investors. The chairman of the Board shall be a Director appointed from time to time at a general meeting of the SO by special resolution.

9.2. Term of service

The SO will be a for-profit operation and selection, appointment and terms of service will be regulated by the SO's Memorandum and Articles of Association.

9.3. Compensation

Board compensation shall be established by the Board of Directors, and approved by the shareholders.

9.4. Conflicts of interest

All Board Members will be required to identify any potential areas of conflict, and shall recuse themselves as appropriate.

9.5. Resignations

The office of a Director shall be vacated if he shall, for whatever reason, cease to be employed by or contracted to provide services to the SO in any such capacity.

9.6. Removal

The Memorandum and Articles of Association define the conditions under which a Director may be removed. A notice of appointment or removal of Directors shall take effect upon lodgment at the office or on delivery to a meeting of the Directors or to the secretary of the Company.

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9.7. Vacancies

The Board shall have the right to appoint a person who is willing to act as a
Director as an additional Director.
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Meetings and Communication

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10.1. The SO Board of Directors

The Board will hold from four to six meetings per year, at least one of which
will be a face-to-face meeting. Meeting notifications for face to face meetings
will be sent not less than 30 days prior to the meeting. Notification for
telephone meetings will be given not less than 7 days prior to the meeting.
Further details on scheduling, procedures for calling and conducting Board
meetings, including telephone meetings, will be defined in the Memorandum and
Articles of Association.

10.2. The Policy Advisory Group

The PAG will provide community access and influence to the policies that set
registration rules for the .Tel. The PAG will conduct its activities with as
much openness and transparency as possible.

An interim PAG will be necessary until such point where the permanent PAG
members are selected. Its primary role will be to:

* Formalize a Charter to govern the PAG

* Complete the first-stage policy initiatives for the sTLD

* Establish procedures and timeframes to create the permanent PAG, after which
the Interim PAG will be dissolved

Please refer to section B6 for a detailed summary concerning PAG and interim
PAG activities.
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Fiscal Information

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Full financial details on the cost of SO operations, staffing, revenue and cost
projections, all related market assumptions, and capital requirements are
detailed in the Financial Model available upon request.

Because the SO falls under the category of "to be formed", there are no
historical records with respect to audits, annual reports or annual statements.
Once formed, all the SO accounts will be audited annually in accordance with
prevailing laws.

SUMMARY FINANCIAL DATA


          YEAR
           END     WATERFALLED
YEAR      STAFF      REVENUE
 Year 1     9       $5,933,481 [1]
 Year 2    10        $4,064,766
 Year 3    11       $10,470,901
 Year 4    13       $21,535,529
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 Year 5   13     $33,196,427
[1] Includes trademark challenge fees (see Part C)


             TOTAL
YEAR         COSTS    [2]
 Year 1    $11,903,770 [3]
 Year 2     $6,801,490
 Year 3    $10,624,362
 Year 4    $15,839,705
 Year 5    $19,673,026
[2] Includes: salaries, benefits, services, travel, facilities, capital
equipment, and miscellaneous expenses (see Part D)
[3] Includes 3rd party verification costs (see Part C)


For the purpose of this application, a minimum financing commitment of USD $10
million has been arranged. A letter of financial commitment from Telnic's main
shareholder is available upon request.
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Indemnification from Liability

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As is customary in the TLD and domain name industry, the SO will, in its
various agreements, disclaim all liability for domain names registered in the
sTLD.

The SO Board of Directors intends to adopt a resolution authorizing the
purchase and maintenance of Commercial General Liability Insurance on behalf of
any agent of the SO, against any liability asserted against or incurred by the
agent in such capacity or arising out of the agent's status as such.

To the maximum extent permitted by law, the SO will indemnify each of its
agents against expenses, judgments, fines, settlements and other amounts
actually and reasonably incurred in connection with any proceeding arising by
reason of the fact that any such person is or was an agent of the SO. For
purposes of this indemnification, an "agent" of the SO includes any person who
is or was a Director, Officer, employee or any other agent of the SO, including
members of any Supporting Organization acting within the scope of his or her
responsibility and on behalf of the best interests of the SO; or is or was
serving at the request of the SO as a Director, Officer, employee or agent of
another corporation, partnership, joint venture, trust or other enterprise.
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Proposed Extent of Policy-Making Authority

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The Sponsoring Organization, by definition, will assume a certain level of
policy making authority, with an emphasis on the unique needs of the community
that it serves. The .Tel sTLD is intended to be complementary to existing TLDs
and not to vary from existing ICANN policies except in the few specific policy
areas that are unique to this sTLD.

Therefore, the SO seeks to:

* Follow ICANN's existing and future policies

* Implement a policy-making authority to address unique policy requirements for
the sTLD

13.1. Requested areas of authority
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13.1.1. Administrative authority

13.1.1.1. Scope of authority

Authority to setup and coordinate the PAG that will be the body responsible for community representation and policy formulation for the sTLD in:

* Determining domain registrations and restriction policies

* Making timely policy recommendations to the SO board

13.1.1.2. Reason/Justification

In order to better represent the appropriate community and to formulate the sTLD policies to the benefit of the community, the SO wishes to take the responsibility to coordinate the policy making with the PAG, including the necessary efforts required for such coordination. The SO believes that by taking this responsibility it will improve the effectiveness of the PAG with respect to formulating the sTLD policies.

13.1.2. Policy related to possible conflicts with other authorities

13.1.2.1. Scope of authority

Where registry policies of the sTLD are or may be in conflict with other bodies/authorities, the SO wishes to have the authority to take steps that will prevent those conflicts.

The authority to set policies on alphanumeric strings may conceivably conflict with national or international telephone numbering plans, or any other legitimate telephone numbering system. It is envisioned that the extent of digits/numbers used will be very limited.

13.1.2.2. Reason/Justification

The sTLD is a letters and words based naming and navigation structure. In the future, the inclusion of limited digit(s) may be needed to meet market demands. For instance: to enable registration of a company name such as "level1". Therefore, it is essential for the SO through the auspices of the PAG to set policies to ensure that digits/numbers are restricted to prohibit any numbering being used in the sTLD that may be confused with any national or international telephone numbering plan or any other legitimate numeric addressing system that may exist.

13.1.3. Domain name registration procedures and name restrictions

13.1.3.1. Scope of authority

Where there is a need to set rules and policies beyond the scope of the ICANN existing ones or to extend the scope of those due to special procedures, the authority to make such policies is requested:

* Sunrise Period and Roll-out (Startup) Period: special policies and rules are required to support the way those periods will be operated.

* Reserved names: authority to assemble a list of reserved names or rules specifying reserved/restricted names.

* Additional data required for the sTLD community: additional data attached to a Registrant Whois data which is relevant to the nature of the .Tel domain name (e.g. Community Member Type).

* Other day-to-day policies raised by the PAG as a result of community's demand.

As part of its Registry Agreement with ICANN, the SO will consult and agree with ICANN on such policies before they are effective to preserve the consistency with ICANN's policies along with addressing the needs of the .Tel community.

13.1.3.2. Reason/Justification

It is necessary to address the unique needs of the .Tel community where additional sets of policies are sought to be required. In those cases, it is sought that the authority for those policies will reside within the remit of the SO, in cooperation and in mutual agreement with ICANN.

13.1.4. Policy making related to registrars

13.1.4.1. Scope of authority

Authority to formulate and enforce policy related to:

* Trademark protection

* Non-abuse of the .Tel domain names

13.1.4.2. Reason/Justification

The .Tel Registry will enter into a contractual relationship with ICANN Accredited Registrars and only accept registrations through them. It is crucial to allow the SO to formulate certain policies that will provide the registrars with guidelines.

13.1.5. Policy making related to additional services

13.1.5.1. Scope of authority

Authority related to future services that will be made in cooperation and in agreement with ICANN.

13.1.5.2. Reason/Justification

Authority is needed to enact policies where there are no respective ICANN policies or where an extension of ICANN policies is required.

For additional information regarding the (1) method of guaranteeing that the organization will administer the policy in the interest of the Internet at large, (2) the means for ensuring opportunity for members of the sTLD Community to discuss and participate in such policy formulation, and (3) the creation of procedures for facilitating participation by a broad cross-section of the Sponsored TLD Community, please see sections B4, B6, B7 and B14.

Policy-Making Process

The process of formulating policies for the sTLD is the basis of the PAG work.

The PAG will be the body responsible for representing the community and formulating the SO's various policies. This will be done by working with the PAG's SO Board Members.

The following outlines PAG procedures that are also described in section B6.

The procedures to enact policies are as follows:

14.1. Initiate policy issues

The PAG will develop and initiate policy issues in a timely manner, while considering the views and input from:

* The Community

* The Sponsoring Organization Board

* ICANN

An interim PAG will be established to fulfill all functions of the PAG until such time when selection for the permanent PAG will take place.

14.2. Community consultation

The PAG will carry out full community consultation and more specifically:

* Create and publish policy consultation papers after the formation of the PAG

* Interact in a timely manner with the community on pending policy issues

* Review community feedback to set official PAG policy agendas

14.3. Formalizing policy recommendations

Formal PAG meetings will be convened to:

* Discuss and decide policies immediately after formal completion of the consultation process

* Make policy recommendations to the SO Board

14.4. SO Board approval

The SO Board will formally consider PAG recommendations, which are then either:

* Accepted by a majority vote by the SO Board and implemented, or

* Not approved for stated reasons and returned to the PAG for reconsideration

The SO Board will be unable to overrule policy recommendations made by unanimous votes of the PAG unless the Board itself is unanimous in its decision.

A. Add new value to the Internet name space

The word "Tel" is internationally understood, with a broad and global meaning denoting a realm of communications services over voice-oriented devices. The marketplace will rapidly adopt the .Tel string to identify services and content related to Internet enabled communications devices.

15.1. .Tel enhances the diversity of the Internet

The proposed .Tel sTLD will be a differentiated namespace that has unique requirements. The services and related content facilitated by this new sTLD are unlike those offered by any other TLD. The proposed sTLD will enable and facilitate the creation and access of new IP centric services, products, and content related to the Internet-Communications community, thereby bringing the power of the DNS, with its easy to use universal text naming, to a major underserved segment of the global Internet.

The following examples cover four key issues illustrating the case for a dedicated .Tel:

15.1.1. Avoiding established addressing systems and regulations

* The ITU has expressed the need to ensure that national and international telephone numbering plans are not affected by any new communications oriented TLD. If any conventional TLD were used as a primary solution for Internet-Communications naming and navigation, it could easily result in clashes with international telephone codes and numbering plans. For example, 888.com is a major gambling web site. If a third level registration within a current TLD were to be used as a dedicated Internet-Communications solution, 888.com would become for instance: 888.call.com, or on the second level of a new sTLD: 888.sTLD. In North America, 888 is an official Federal Communications Commission (FCC) free phone code, thus resulting in possible abuses and consumer confusion.

* To avoid possible misuse and consumer confusion, a dedicated namespace that restricts numeric registrations is essential. It is only possible to have full numeric restrictions via the creation of a new sTLD.

15.1.2. Capacity or name availability

* Within existing TLDs, most brands have been registered and are currently in use, supporting legacy Internet applications. As a consequence of name depletion, future demands on capacity and sustainability of an Internet-Communications sTLD would be in question if incorporated into some form of existing TLD system. Therefore, a clean-slate dedicated sTLD is a prerequisite to ensuring capacity, and as a safeguard for stable implementation of related policies.

15.1.3. Fragmentation

* Developing a new communications oriented sTLD within an established TLD would create a series of naming distortions, resulting in increased fragmentation of the namespace, impeding competitive services, and leading to consumer confusion.

* Using conventional TLDs would result in further fragmentation as many potentially competing "naming standards" will emerge, all using different existing TLDs. For example, if it was somehow decreed that a sub-addressing string called "contact" should be used for Internet-Communications purposes, this could generate a bewildering array of unaligned Internet-Communications

naming structures such as: contact.com, contact.info, contact.org etc.
Consequently, a single, new and unifying ICANN-sanctioned sTLD is the natural
solution.

* A single standardized and global namespace is required so that end users can
easily recognize and access Internet-Communications services and related
content or have a universal identity in this namespace.

15.1.4. Bridging fixed-line and wireless services

* Recent technology developments will lead to fixed-line and wireless
convergence that will require a single naming structure to act as a bridge.
Fixed/Mobile Convergence will enable integration of fixed and mobile networks,
to provide seamless voice, data, and value added services.

* .Tel will give a single text-based address to individuals or businesses so
that they can be contacted wherever they chose, whether via a wireless or
fixed-line Internet-enabled communications device.

* It is a prerequisite that the new TLD should not be based on underlying
network technologies. Hence, .Tel serves as an independent bridge and unifier
of both fixed and wireless modes of communications.

15.2. .Tel will reach and enrich broad global communities

The Internet-Communications space is currently served by third-level and
sub-domain registrations under existing Network Operator's second-level
domains. The resulting fragmentation and customer confusion is impeding the
growth of this high-potential namespace.

Furthermore, the ongoing use of established ccTLDs and gTLDs for
Internet-Communications services and related content will only result in
greater fragmentation. Even if a "standard" were to be established, there is
currently no mechanism to enforce standardization. The result will be a
bewildering array of alternics and sub-addressing strings. A single, new and
unifying sTLD is the natural solution.

Finally, a .Tel sTLD will especially benefit non-US users, since the use of
Internet-enabled voice oriented communications devices is much more common
outside the US, and this is expected to continue.

Execution of this proposal will also bring the proven benefits of the DNS to
all registered content and contact sites while allowing individual networks,
whether fixed or mobile, to continue to differentiate service offerings to
their subscribers. It will help assure name portability and open access to
published content. It will also encourage the creation of new Application
Service Providers (ASPs) not directly associated with network operators, thus
expanding the services and related content available.

As proposed, this new domain will enhance competition, expanding both the scope
and variety of services and related content available. This will add richness
of the users' experience.

B. Protect the rights of others

The .Tel Registry will employ and use a procedure that will enable intellectual
property owners to protect their valuable property.

In order to protect their rights, trademark and service mark holders should
have an opportunity to register their names, before the public does. They
should have their names protected and should have a channel through which they
can raise a dispute or a claim against an unqualified registered domain name of
their trademark.

16.1. Sunrise period

Trademark and service mark holders should have the first opportunity to
register their names before the public, thus protecting their right to preserve
their name.

In light of the experience gained through the introduction of other gTLDs (e.g.
.info .biz) and the way these registries rolled out in the past 3 years, the SO
believes that the best way to achieve that is by providing the trade/service
mark holders a pre-registration or Sunrise period.

The Sunrise period is a three months period where only trademark and service
mark holders will be able to register their names prior to the formal start of
the registry services.

16.2. Sunrise features

16.2.1. Sunrise period

* The Sunrise period will start 5 months prior to the start of service, and
will last for three months, followed by a two months "Quiet" period where no
registrations will be accepted in order to allow an assessment of the Sunrise
period and the nature of its registrations.

16.2.2. Non resolving domains

* During the Sunrise period and until the start of service, domains registered
during the Sunrise period will not resolve, and will be locked until start of
service, when they will be uploaded to the zone and start to resolve.

16.2.3. Who is qualified to register during the Sunrise period

* In general, any entity that holds a trademark or a service mark will be
eligible and qualified for the Sunrise period. The exact definition of who is a
trademark holder with respect to .Tel domain registration in the Sunrise period
and other procedures relating to the Sunrise period will be clearly defined by
the "Interim PAG" before the launch of the Sunrise period. Registrations
obtained during the Sunrise period will be subject to challenge as described in
section B18.

16.2.4. Additional data provided

* Registrants in the Sunrise period will be required to provide the trademark
information as part of the registration process and also the category to which
they belong in the .Tel namespace. All that additional data will be included in
the published Whois information.

16.2.5. Trademark challenge process

* The .Tel Registry will require all Sunrise registrants to enter a valid
trademark registration number as part of the registration process. Should a
third party wish to dispute the registrant's right to register a domain name,

the challenging party will be required to pay a trademark challenge fee of $300 for each domain name they wish to challenge. The .Tel Registry will use a well known authoritative body (e.g. WIPO or NAF) as a sub contractor, to manage the trademark verification process. All trademark challenge fees will be used solely for the protection of the rights of others and legal fees related to that area. There will be a separate fee schedule for the trademark challenge process (see Part C).

* The specifications of the trademark challenge and verification process will be developed in cooperation with ICANN and the body that will manage that verification process, and published on the SO website.

16.3. Registration process and registrars

The .Tel Registry will accept registration through ICANN accredited registrars and only through them. The ICANN registrars are obligated to the protection of rights of others and the accuracy of the domain name registration data as a provision of their RAA with ICANN. Registering domain names only via an accredited registrar will therefore strengthen the protection of the rights of others.

In addition, registrars will have to comply with the registry rules and policy concerning the protection of the rights of others including additional provisions in their registration agreements with their registrants related to trademark and service mark holders.

16.4. Arbitration procedure and ICANN compliance

The .Tel Registry will comply and follow the current and future developed rules and policies adopted by ICANN related to a dispute resolution policy.

C. Assurance of charter-compliant registrations and avoidance of abusive registration practices

The SO, through the work of the PAG, will ensure the non or minimal abusive registrations will be made to the .Tel sTLD. The following details the measures to be taken to formulate, enforce and monitor the appropriate policy.

17.1. Discourage registration of domain names that infringe intellectual property rights

The SO will implement two major measures to ensure the minimal abuse of intellectual property rights.

* The SO will implement the Sunrise period to provide trademark and service mark holders the opportunity for first registering their domain names. A trademark challenge process will be implemented to address situations where a third party wishes to challenge the registrant's right to register a trade or service mark (see section 16.2.5 above).

* The SO will provide the opportunity to trademark and service mark holders to defend their names even if they are not members of the sTLD community.

Any registration will be a subject to a UDRP procedure under the ICANN existing policy. For more detail, see section B16.

17.2. Ensure registrations only by community members

Only individuals or businesses belonging to the Internet-Communications
community are entitled and eligible for registering a domain name under the
.Tel namespace.

When registering a name, through the registration process, a registrant must
indicate its role in the community. The registrant will be provided with a list
of options from which to select.

The options are:

* Universal identity brand or name user for the .Tel namespace

* Service provider for the .Tel namespace

* Related content provider for the .Tel namespace

The registration agreement will require every registrant to provide full and
accurate information. Category information will be mandatory to register a new
domain name or modify the registrant information of an existing domain name.

The registrars will be obligated, through their RRA with the .Tel Registry, to
accept and maintain accurate information of the domain name data, with a
special emphasis on the relations between the registrant and the community.

Registrants will be obligated to certify that they will use their domain names
in accordance with the policies and restrictions enacted by the SO.

17.3. Consider a reservation list of names to prevent inappropriate name
registrations

The SO will compile a set of rules for reserved names and a list of specific
names to be reserved from registration:

* Domain name strings containing only digits with or without a dash (e.g.
08001234567, 0-800-1234567) will be restricted and reserved to maintain the
integrity as a letters/words based top-level domain

* For consistency with ICANN policy no one or two letter domain names will be
allowed for registration (e.g. a.tel, ab.tel will be reserved)

* ICANN & IANA related names as determined by ICANN

* Country names

* Registry reserved name list as will be agreed between the SO and ICANN

17.4. Minimize abusive registrations

To minimize abusive registrations, the SO will:

* Adopt the UDRP procedures according to ICANN policy, thus ensuring that at
any time a UDRP complaint can be submitted against a suspected abusive
registration.

* Conduct a periodical verification on domain names either picked up randomly
or previously suspected to be abusive, and ensure that both the Whois
information is accurate and the domain name holder belongs to the .Tel
community.

17.5. Comply with applicable trademark and anti-cybersquatting legislation

The SO will comply with international trademark and cyber-squatting laws that apply to the operation of a domain name registry.

In light of ICANN's Working Group B findings that the creation of a famous names list was not feasible, only trademark and service mark registrations will be highly protected. However, the SO will follow ICANN policies with respect to the protection of famous names.

D. Assurance of adequate dispute-resolution mechanisms

The SO will implement ICANN's policies with respect to dispute resolution, including adoption of the Uniform Dispute Resolution Policy, as the same may be amended from time to time. The SO may supplement the UDRP with ICANN approved policies and procedures relating to the cancellation of (a) improper Sunrise registrations, and (b) domain names that are not being used in accordance with sTLD policies.

The SO will implement a Sunrise dispute resolution procedure in order to minimize the ability of ineligible domain name applicants to register domain names during that period.

Under this dispute resolution procedure, challenges may be filed at any time up to 90 days following the close of the Sunrise period. During the challenge period, the SO will prohibit the transfer of all registrations obtained during the Sunrise period except for transfers necessary as a result of a successful challenge or pursuant to a court order. If a challenge is successful, the registration will be cancelled or, if the challenger has a trademark registration that meets the Sunrise eligibility requirements, it will be transferred to the challenger.

Challenges will be processed in the order they were received, with the first successful challenger being eligible to re-register the domain name if the challenger is able to meet the Sunrise eligibility requirements. Challenged domain names will be placed "on hold" by the SO until either (a) there is a successful challenge, or (b) there are no more outstanding challenges.

E. Provision of ICANN-policy compliant WHOIS service

The sTLD will follow the centralized real-time Whois system which reflects a thick Registry model, as described in detail in Part E.

The Registry Operator will have to operate a registry-level Whois service that will provide public access to all of the sTLD's domain name registration data in real-time.

The SO is committed to being a responsible participant in the efforts of the Internet community to balance the need for data privacy with the need to provide access to records that allow the public to identify and contact domain name holders. To that end, the sTLD will strive to maintain open access to registrant information to the extent compatible with applicable privacy laws and sTLD policy of treating all registrants equitably.

In addition, via the RLA, the sTLD will require registrars to post privacy policies that provide clear and complete notice to registrants of the type of

data that will be collected and maintained by the sTLD, the use of such data in
operating the registry service, (including display through the Whois service),
and the registrant's rights to access and correct data maintained by the
Registry Operator. Clear consent to such data practices will be a prerequisite
to the submission of a domain name registration request.

As part of the subscription agreement to the bulk access service of the Whois
database, subscribers will agree to abide by all applicable privacy laws and to
indemnify the SO in the event that SO is investigated or prosecuted by a
national data protection or other authority as a result of the subscriber's use
of the database.

In addition, for each type of Whois access (general queries, bulk access and
enhanced searches), the Registry Operator, via the registrars, will require
customers to enter into an agreement prohibiting the customer from using the
Whois database to send unsolicited e-mail to registrants, solicit them by
telephone or use the database for other such commercial purposes.

The SO will not use the Whois service to send unsolicited e-mail to
registrants, to solicit registrants by telephone, or to otherwise engage in
unauthorized usage of their data. The sTLD will not sell registrant information
to third parties.