

The Internet Corporation for Assigned Names and Numbers

06 June 2014

VIA EMAIL ONLY

Lyman Chapin Chair, Registry Services Technical Evaluation Panel Email: lyman@interisle.net

RE: Technical Bundle for .NGO and .ONG New gTLDs

Dear Lyman,

ICANN has received a proposal under the Registry Services Evaluation Policy from Public Interest Registry (PIR) to offer support for mandatory technical bundling of second-level domain registrations for .NGO and .ONG.

On 03 June 2014, ICANN informed PIR of its preliminary determination to submit the Proposal to the Registry Services Technical Evaluation Panel (RSTEP) for further evaluation. ICANN has determined that the proposed Registry Service might raise significant Stability or Security issues, and we are referring the request to the Registry Services Technical Evaluation Panel for evaluation. PIR has confirmed that it intends to proceed with the evaluation of the Proposal by the RSTEP. A copy of their response is attached.

Under Section 2.6 of the Policy, "in the event that ICANN reasonably determines during the 15 calendar day 'preliminary determination' period that the proposed Registry Service might raise significant Security or Stability issues, ICANN will refer the proposal to the Registry Services Technical Evaluation Panel." This preliminary review has concluded that the community would benefit from a thorough analysis of the potential Security and Stability issues raised by the mandatory technical bundling of second level domain registrations for .NGO and .ONG.

In order to assist the RSTEP in its evaluation, this letter provides background information on the PIR Proposal.

Background on PIR's Proposal

PIR submitted its proposal to ICANN on 12 Mar 2014. This submission followed a series of informal discussions between PIR and ICANN staff, a written request for clarifications regarding the RSEP proposal, and PIRs response to the written request for clarifications.

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The proposal includes PIR's explanation of the proposed technical bundling, the implementation of the EPP commands, the handling of DNSSEC, handling of second-level IDN variants and WHOIS service. Please refer to Appendix A attached to this letter to view PIRs RSEP request, and Appendix B attached to this letter to view PIRs written response to ICANNs request for clarifications regarding the RSEP proposal.

RSTEP Review

Upon referral of this Proposal to the RSTEP, PIR may submit to the RSTEP and ICANN additional information or analyses regarding the likely effect of the Proposal on security and stability.

A copy of this referral and the relevant documents related to the PIR proposal will be posted on the ICANN website. Under the terms of the Policy, the RSTEP shall have up to 45 calendar days from the date of this letter, until 21 July 2014, to prepare a written report regarding the Proposal's effect on security and stability, which report (and a summary of any public comments) will be provided to the ICANN Board. The report shall set forward the opinions of the RSTEP including, but not limited to, a detailed statement of the analysis, reasons and information upon which the panel has relied in reaching their conclusions.

Please let me know if I may be of further assistance.

Sincerely

Krista Papac

Director, Registry Services

ICANN

Enclosures

Appendix A



ICANN Registry Request Service

Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

Status: ICANN Review

Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

Proposed Service

Name of Proposed Service:

Technical Bundle for .NGO and .ONG New gTLDs

Technical description of Proposed Service:

Public Interest Registry intends to offer support for mandatory technical bundling of second level domain registrations for .NGO and .ONG.

A Technical Bundle is a set of two domain names in different TLDs, with identical second level labels for which the following parameters are shared:

- o Registrar Ownership
- o Registration and Expiry Dates
- o Registrant, Admin, Billing, and Technical Contacts
- o Name Server Association
- o Domain Status
- o Applicable grace periods (Add Grace Period, Renewal Grace Period, Auto-Renewal Grace Period, Transfer Grace Period, and Redemption Grace Period)

And for which at least the following parameters are unique:

o DS records as required based on RFC 5910

Technical Bundling is defined as the process of managing a Technical Bundle.

Example:

<EXAMPLE.NGO> and <EXAMPLE.ONG> will consist of a Technical Bundle, and will conform to the sharing criteria listed above. <EXAMPLE.NGO> and <EXAMPLE1.ONG> will not be a Technical Bundle.

Registry EPP Operations

This solution will require no custom extensions and is based on existing core EPP RFC functionality.

This solution is compliant with the following relevant EPP RFCs:

- o RFC 5730 Extensible Provisioning Protocol (EPP)
- o RFC 5731 Extensible Provisioning Protocol (EPP) Domain Name Mapping
- o RFC 5732 Extensible Provisioning Protocol (EPP) Host Mapping
- o RFC 5733 Extensible Provisioning Protocol (EPP) Contact Mapping
- o RFC 5734 Extensible Provisioning Protocol (EPP) Transport over TCP
- o RFC 3735: Extensible Provisioning Protocol (EPP) Guidelines for Extending the EPP
- o RFC 3915: Extensible Provisioning Protocol (EPP) Domain Registry Grace Period Mapping for the Extensible Provisioning



Ticket ID: P4L5P-7Z1S6

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Protocol (EPP)

o RFC 5910: Domain Name System (DNS) Security Extensions Mapping for the Extensible Provisioning Protocol (EPP)

Domain Check

When performing a domain check, either domain name within the Technical Bundle can be queried for the EPP command. For example, a Registrar may execute a domain check operation for "example.ngo" or "example.ong"; either command will return the same response.

Domain Create

The domain create operation will accept either a .NGO or a .ONG domain name. If the domain name is available, a Technical Bundle consisting of the .NGO and .ONG domain names will be registered.

Please see "DNSSEC in the Technical Bundle" section below for more details on how DNSSEC is handled in the Technical Bundle.

The following diagram outlines the domain create process for a Technical Bundle:

SEE GRAPHICS IN ATTACHED PDF

Domain Update

The domain update command will accept either a .NGO or .ONG domain name. Any modifications to contact associations, name server associations, domain status values and authorization information will be applied to domain names within the Technical Bundle.

Please see "DNSSEC in the Technical Bundle" section below for more details on how DNSSEC is handled in the Technical Bundle.

The following diagram outlines a successful domain update command:

SEE GRAPHICS IN ATTACHED PDF

Domain Query

The domain info command will accept either a .NGO or .ONG domain name. The information returned by the command will be compliant with the core EPP RFCs listed above.

The following diagrams illustrate domain info responses from the Registry when a domain info command is performed: SEE GRAPHICS IN ATTACHED PDF

Domain Renew

The domain renew command will accept either a .NGO or .ONG domain name. Upon a successful domain renewal, domain names within the Technical Bundle will have their expiry date extended by the requested term. Upon a successful domain renewal, domain names within the Technical Bundle will conform to the renew grace period.



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

Status: ICANN Review

Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

The following diagram outlines the domain renew process: SEE GRAPHICS IN ATTACHED PDF

Domain Delete

The domain delete command will accept either a .NGO or .ONG domain name. Upon successful completion of a domain delete, the following process will be performed depending on the state of the domain names within the Technical Bundle:

Scenario 1: The domain names within the Technical Bundle are within the add grace period.

In this scenario, a domain delete will refund the domain names created within the Technical Bundle, and made available for registration.

Scenario 2: The domain names within the Technical Bundle are within the renew grace period.

In this scenario, a domain delete will refund the domain names renewed within the Technical Bundle, and enter the domain names into the Redemption Grace Period (RGP), and assign a pendingDelete status.

Scenario 3: The domain names within the Technical Bundle are outside of grace periods.

In this scenario, a domain delete will place the domain names within the Technical Bundle into RGP, and assign a pendingDelete status.

The following diagrams show the behavior of a successful delete command on the domain names in the Technical Bundle, both inside and outside of the add grace period.

SEE GRAPHICS IN ATTACHED PDF

Domain Restore

The domain restore command will accept either a .NGO or .ONG domain name. Upon successful completion of a domain restore, the domain names within the Technical Bundle will be restored and have the appropriate RFC compliant server statuses placed on them.

Domain Transfer

The domain transfer command will accept either a .NGO or .ONG domain name. Upon successful completion of a domain transfer request, the domain names within the Technical Bundle will enter a pendingTransfer status. Upon approval of the transfer request, the domain names within the Technical Bundle will be owned and managed by the new Registrar.

The diagrams below illustrate the behavior of the domain transfer operation. Registrar A represents the new Registrar, while Registrar B represents the current Registrar.

SEE GRAPHICS IN ATTACHED PDF

Contact & Host Operations

Contact operations are unchanged and are compliant with the core EPP RFCs listed above. Contacts associated with a domain name within a Technical Bundle will be associated to all domain names within the Technical Bundle. If contact



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

Status: ICANN Review

Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

information is updated, those changes will be reflected on all domain names that contact is associated with.

Host operations are unchanged and are compliant with the core EPP RFCs listed above. Child hosts can be created for any of the domain names in the Technical Bundle and be assigned their own IP addresses. These child hosts can be associated to any domain in the Registry as name servers. Updates to the child hosts will be reflected on all associated domain names.

DNSSEC in the Technical Bundle

Domain Create

If any DS information is specified at the time of a domain create, those records will only be associated to the domain name specified in the create command. In order to associate DS records to the appropriate domain names within the bundled set of domain names, the domain update command must be utilized.

Domain Update

If DS records are specified in the domain update command, those records will only be associated with the domain name specified in the domain update request.

Second level IDN Variants in the Technical Bundle

All registry policies with regard to IDN variants at the second level for the .NGO and .ONG TLDs will be applied to IDN domain names within the Technical Bundle.

Example:

If the IDN policy is to block IDN variants from registration, and the label xn--uitob489r has the following IDN variants xn--djtvjw90h and xn--imt4q562g; the successful domain registration of xn--uitob489r.ngo and xn--uitob489r.ong as a Technical Bundle will have the following IDN variants blocked from registration:

xn--djtvjw90h.ngo, xn--imt4q562g.ngo, xn--djtvjw90h.ong, xn--imt4q562g.ong

WHOIS Service

Whois services will be available for both .NGO and .ONG Registries. Whois services for both TLDs will comply with all ICANN policies, including Specification 4 and Specification 10 of the new gTLD Registry Agreement, and RFC 3912.

Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

PIR has been engaged in worldwide outreach efforts with the global NGO community for over two-years. The registry has



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

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Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

sponsored NGO workshops in nearly every corner of the globe, resulting in deep meaningful engagement with the community it hopes to serve. NGOs have consistently expressed concern about the potential costs of defensive registrations, as well as the potential for confusion should the same second-level domain be registered by different NGO entities in .NGO and .ONG. The proposed service would alleviate both concerns.

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

N/A

b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

In the past twelve months, PIR has consulted with a number of ICANN accredited registrars with a variety of business models concerning the proposed bundling service. The nature of these consultations is best described as a sustained proactive dialogue between PIR and registrars, including live and in-person engagements, teleconferences and written materials furnished by PIR to registrars. PIR has distributed several versions of a .NGO|.ONG Product Guide, which details the proposed Technical Bundle. PIR's engagement with the registrar community has been open and transparent and has yielded constructive and positive feedback.

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

No. None.

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

PIR has been engaged in worldwide outreach efforts with the global NGO community for over two-years. The registry has sponsored NGO workshops in nearly every corner of the globe, resulting in deep meaningful engagement with the community it hopes to serve. NGOs have consistently expressed concern about the potential costs of defensive registrations, as well as the potential for confusion should the same second-level domain be registered by different NGO entities in .NGO and .ONG. The proposed service would alleviate both concerns.



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

Status: ICANN Review

Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

Non-governmental organizations ("NGOs") have indicated to PIR that they will endorse this service. The .NGO and .ONG communities are essentially the same. .ONG is intended for entities that use Romance languages (e.g.,French, Spanish, Italian and Portuguese).

Technical Bundling of .NGO and .ONG would serve to protect against public confusion that reasonably may ensue if different NGO entities were able to register the same second-level domain name, one in .NGO and the other in .ONG. Also Technical Bundling will help mitigate the need for defensive registrations, thereby allowing NGO community registrants, whether in .NGO or in .ONG, to focus on their mission and outreach in a transparent and effective manner.

The benefit of this approach is twofold: (1) it eliminates the likelihood of public confusion that reasonably may ensue if different NGO entities were able to register the same second-level domain; and (2) it provides the registrant with a defensive registration to ensure that the NGO is able to focus on its mission and outreach in a transparent and effective manner.

f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

We are not aware of any such possible objection, and do not foresee any.

Timeline

Please describe the timeline for implementation of the proposed new registry service:

PIR plans to launch .NGO and .ONG with technical bundling registration support as soon as possible after the successful conclusion of this process and NGPC approval. Based on ICANN guidance as to the timelines for RSEP/RSTEP and pre-delegation, we anticipate a sunrise launch sometime in Q3 2014.

Business Description

Describe how the Proposed Service will be offered:

Public Interest Registry intends to offer support for mandatory Technical Bundling of second level domain registrations for .NGO and .ONG.



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

Status: ICANN Review

Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

Registrars do not require new EPP commands and extensions to use the Technical Bundle. Domain names in a Technical Bundle will be subject to the same terms and conditions. Please refer to the technical description above for details on how this service will be offered.

Describe quality assurance plan or testing of Proposed Service:

Public Interest Registry (PIR) has been successfully managing .ORG, one of the internet's original gTLDs, for over ten years. PIR uses Afilias Limited as the registry backend service provider who will also support .NGO and .ONG. Afilias has experience managing Registry Systems for over a decade and supports comprehensive registration lifecycle services including the registration states, any modifications required with the introduction of any new ICANN policies, and addressing any potential security or stability concerns.

Afilias adheres to a consistent approach to quality assurance for all changes to the Registry System. Key process components include:

- o Functional testing; this process is to ensure all test cases executed fully cover all aspects of the new requirements and specifications.
- o Regression testing; this process is to ensure all existing services and features in the system are in proper working order.
- o Scalability and performance testing; this process is to evaluate the impact to system performance with the added changes.
- o Security testing; coverage here includes confidentiality, system integrity, authorization and authentication.
- o User-based testing; typically the final step in the process prior to production launch is to allow all eligible Registrars to complete testing of the updated Registry System within a sandbox environment.

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:

This solution is compliant with the following relevant EPP RFCs:

- o RFC 5730 Extensible Provisioning Protocol (EPP)
- o RFC 5731 Extensible Provisioning Protocol (EPP) Domain Name Mapping
- o RFC 5732 Extensible Provisioning Protocol (EPP) Host Mapping
- o RFC 5733 Extensible Provisioning Protocol (EPP) Contact Mapping
- o RFC 5734 Extensible Provisioning Protocol (EPP) Transport over TCP



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

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Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

o RFC 3735: Extensible Provisioning Protocol (EPP) Guidelines for Extending the EPP

o RFC 3915: Extensible Provisioning Protocol (EPP) Domain Registry Grace Period Mapping for the Extensible Provisioning Protocol (EPP)

o RFC 5910: Domain Name System (DNS) Security Extensions Mapping for the Extensible Provisioning Protocol (EPP)

Co

ontractual Provisions	
List the relevant contractual provisions impacted by the Proposed Service:	
None.	
What effect, if any, will the Proposed Service have on the reporting of data to ICANN:	
None.	
What effect, if any, will the Proposed Service have on the Whois?:	
None.	

Contract Amendments

Please describe or provide the necessary contractual amendments for the proposed service:

We do not anticipate the need for any amendment of our .NGO or .ONG Registry Agreements.

Benefits of Service

Describe the benefits of the Proposed Service:

The proposed Technical Bundling service will serve the NGO community by protecting against public confusion that



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

Status: ICANN Review

Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

reasonably may ensue if different NGO entities were able to register the same second-level domain. It also will help mitigate the need for defensive registrations.

Technical Bundling of .NGO and .ONG would serve to protect against public confusion that reasonably may ensue if different NGO entities were able to register the same second-level domain name, one in .NGO and the other in .ONG. Also Technical Bundling will help mitigate the need for defensive registrations, thereby allowing NGO community registrants, whether in .NGO or in .ONG, to focus on their mission and outreach in a transparent and effective manner.

Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

No.

How would you define the markets in which your proposed Registry Service would compete?:

The relevant market is the wholesale market for .NGO and .ONG domain names.

What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

The concept of bundling multiple domain names is not new to the industry. Examples of similar products and services widely utilized today include:

o Registrars offering the ability to purchase multiple domain names across a span of TLDs in a bundle for the purpose of marketing and promotions.

o ccTLD and gTLD Registry Operators offering second level IDN registrations and their treatment of variants of those second level IDN registrations.

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

No other company would be affected.



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

Status: ICANN Review

Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.:

We are working with Afilias Ltd, our backend registry services provider, to offer the proposed service.

Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications.:

As noted above, in the past twelve months, PIR has consulted with a number of ICANN accredited registrars with a variety of business models concerning the proposed bundling service. The nature of these consultations is best described as a sustained proactive dialogue between PIR and registrars, including live and in-person engagements, teleconferences and written materials furnished by PIR to registrars. PIR has distributed several versions of a .NGO|.ONG Product Guide, which details the proposed Technical Bundle. PIR's engagement with the registrar community has been open and transparent and has yielded constructive and positive feedback.

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

No.

Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

No.

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of reponses to Internet servers or end systems:

Based on our quality assurance process, there is no evidence that the proposed service will impact throughput, response time, consistency or coherence of responses.



Ticket ID: P4L5P-7Z1S6

Registry Name: Public Interest Registry

gTLD: .org .xn--i1b6b1a6a2e

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Status Date: 2014-05-21 13:46:03 Print Date: 2014-06-06 02:36:05

	Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:	
	No.	
Other Issues		
	Are there any Intellectual Property considerations raised by the Proposed Service:	
	No.	
	Does the proposed service contain intellectual property exclusive to your gTLD registry?:	
	No.	
	List Disclaimers provided to potential customers regarding the Proposed Service:	
	N/A	
	Any other relevant information to include with this request:	
	None.	

Appendix B

Public Interest Registry offers these answers in response to the clarifying questions raised by ICANN staff on 21 April 2014 (as noted below):

1. Please send us the attachment mentioned in your RSEP request for EPP commands.

A PDF of our RSEP, which addresses EPP commands, is attached. This is the same document that was sent under separate cover when we filed our RSEP on 12 March 2014.

2. Please describe clearly how WHOIS will be queried and displayed.

WHOIS services will be available for both .NGO and .ONG Registries. WHOIS services for both TLDs will comply with all ICANN policies, including Specification 4 and Specification 10 of the new gTLD Registry Agreement, and RFC 3912.

Each TLD will have its own WHOIS display. WHOIS services will be available at the locations defined by Specification 4 of the new gTLD agreement:

- whois.nic.ngo for the .NGO Registry; will be available via port 43 as well as with a web based searchable interface on port 80.
- whois.nic.ong for the .ONG Registry; will be available via port 43 as well as with a web based searchable interface on port 80.

The following examples offer WHOIS port 43 queries and responses for .NGO and .ONG Registries.

whois -h whois.nic.ngo example.ngo

Domain Name:EXAMPLE.NGO Domain ID: D85779521-LROR Creation Date: 2002-04-19T19:41:43Z Updated Date: 2013-06-25T23:08:53Z Registry Expiry Date: 2015-04-19T19:41:43Z

Sponsoring Registrar: GoDaddy.com, LLC (R91-LROR)

Sponsoring Registrar IANA ID: 146

WHOIS Server: Referral URL:

Domain Status: clientDeleteProhibited Domain Status: clientRenewProhibited Domain Status: clientTransferProhibited Domain Status: clientUpdateProhibited Domain Status: serverDeleteProhibited Domain Status: serverTransferProhibited

Registrant ID:CR30380580

Registrant Name:Domain Administrator

Registrant Organization: Go Daddy Operating Company, LLC

Registrant Street: 14455 N Hayden Rd Suite 219

Registrant City:Scottsdale Registrant State/Province:Arizona Registrant Postal Code:85260

Registrant Country:US

Registrant Phone:+1.4805058800

Registrant Phone Ext:

Registrant Fax: +1.4805058844

Registrant Fax Ext:

Registrant Email:companynames@godaddy.com

Admin ID:CR30380582

Admin Name: Domain Administrator

Admin Organization: Go Daddy Operating Company, LLC

Admin Street: 14455 N Hayden Rd Suite 219

Admin City:Scottsdale Admin State/Province:Arizona Admin Postal Code:85260 Admin Country:US

Admin Phone:+1.4805058800

Admin Phone Ext:

Admin Fax: +1.4805058844

Admin Fax Ext:

Admin Email:companynames@godaddy.com

Tech ID:CR30380581

Tech Name: Domain Administrator

Tech Organization: Go Daddy Operating Company, LLC

Tech Street: 14455 N Hayden Rd Suite 219

Tech City:Scottsdale

Tech State/Province: Arizona Tech Postal Code: 85260

Tech Country:US

Tech Phone:+1.4805058800

Tech Phone Ext:

Tech Fax: +1.4805058844

Tech Fax Ext:

Tech Email:companynames@godaddy.com

Name Server:PDNS03.DOMAINCONTROL.COM Name Server:PDNS04.DOMAINCONTROL.COM

DNSSEC:signedDelegation

DS Created 1:2010-07-27T20:57:22Z

DS Key Tag 1:31589 Algorithm 1:8

Digest Type 1:1

Digest 1:7b8370002875dda781390a8e586c31493847d9bc

DS Maximum Signature Life 1:1814400 seconds

whois -h whois.nic.ong example.ong

Domain Name:EXAMPLE.ONG Domain ID: D85779521-LROR Creation Date: 2002-04-19T19:41:43Z Updated Date: 2013-06-25T23:08:53Z

Registry Expiry Date: 2015-04-19T19:41:43Z

Sponsoring Registrar:GoDaddy.com, LLC (R91-LROR)

Sponsoring Registrar IANA ID: 146

WHOIS Server: Referral URL:

Domain Status: clientDeleteProhibited Domain Status: clientRenewProhibited Domain Status: clientTransferProhibited Domain Status: clientUpdateProhibited Domain Status: serverDeleteProhibited Domain Status: serverTransferProhibited

Registrant ID:CR30380580

Registrant Name: Domain Administrator

Registrant Organization: Go Daddy Operating Company, LLC

Registrant Street: 14455 N Hayden Rd Suite 219

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Admin Fax Ext:

Admin Email:companynames@godaddy.com

Tech ID:CR30380581

Tech Name:Domain Administrator

Tech Organization: Go Daddy Operating Company, LLC

Tech Street: 14455 N Hayden Rd Suite 219

Tech City:Scottsdale

Tech State/Province: Arizona

Tech Postal Code:85260

Tech Country:US

Tech Phone:+1.4805058800

Tech Phone Ext:

Tech Fax: +1.4805058844

Tech Fax Ext:

Tech Email:companynames@godaddy.com

Name Server:PDNS03.DOMAINCONTROL.COM

Name Server:PDNS04.DOMAINCONTROL.COM

DNSSEC:signedDelegation

DS Created 1:2010-07-27T20:57:22Z

DS Key Tag 1:31590

Algorithm 1:8

Digest Type 1:1

Digest 1:7b8370002875dda781390a8e586c314968767c8da

DS Maximum Signature Life 1:1814400 seconds

The following examples offer Web WHOIS queries and responses for .NGO and .ONG Registries.

http://whois.nic.ngo

DNSSEC: Unsigned



http://whois.nic.ong



3. Please explain how domain disputes (e.g. UDRP, URS, PICDRP, PDDRP) are handled.

Public Interest Registry fully intends to honor all of its contractual obligations related to Legal Rights Protection (LPR) mechanisms. Our proposed technical bundle does not alter these obligations in any way. LPR cases, including the UDRP, URS, PDDRP and our RDRP (Restrictions Dispute Resolution Procedure), will be handled as prescribed in our contracts.

As bundling will result in the creation of *identical second-level domain names* for each string, i.e. registration of "dogoodnik.ngo" will automatically result in the registration of "dogoodnik.ong," and the registrant of a .ngo or .ong domain name will not be permitted to "split" the bundle, any dispute concerning a second level domain and a registrant's right to hold or use that second-level domain name will necessarily implicate the matching second-level rights in both strings. Simply stated, if the registrant of "dogoodnik.ngo" loses a UDRP, URS or other dispute, such ruling will automatically apply equally to the registrant's right to hold or use "dogoodnik.ong." If appropriately directed to do so, this would include the application of locks on the domains.

4. Please explain how PIR will address the situation where .nog and .ong are no longer offered as a bundle.

PIR believes it is highly unlikely that any situation will arise where NGO and .ONG are no longer offered as a bundle. There are, however, certain scenarios that might change this, e.g. governmental or judicial decisions (such as a UDRP determination) requiring a change. Several possibilities may be considered:

- 1. A requirement for ending the entire bundling procedure retroactively. In this case, PIR would dismantle the technical bundling procedures and inform all registrants that the formerly bundled registrations would be treated independently as if registered separately.
- 2. A requirement for ending the bundling procedure prospectively for new registrations. In this case, PIR would stop using the technical bundling procedures for new registrations only, but would preserve the procedures for existing registrations.
- 3. A requirement for treating one or more (but not all) individual registrations as independent, either retroactively or prospectively. In this case, PIR would comply with the requirement as necessary for the individual registration(s) affected.