



**VERISIGN**

February 1, 2022

**Via Electronic Mail**

Russ Weinstein  
Vice President, GDD Accounts and Services  
Internet Corporation for Assigned Names and Numbers  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**Re: Clarification of New Compliance Directives from MIIT**

Dear Russ:

This letter is in response to ICANN's January 28, 2022 request that Verisign submit non-confidential documentation regarding Verisign's plans to comply with new local law compliance directives from MIIT associated with the *Measures for the Administration of Domains Names*. This letter is intended to comply with ICANN's request.

Verisign intends to make certain modifications to its existing registrar requirements and systems related to the timing of when new domain name registrations or bulk transfers from Subject Registrars (i.e., those licensed by MIIT to operate in the People's Republic of China) are placed on "serverHold" status when the applicable domain names do not have a required real name verification code ("RNVC") at the time of registration or bulk transfer.

We have reviewed Verisign's Verification Code RSEP and determined that no changes are necessary because the Verification Code RSEP does not specify, or otherwise propose to limit, the timing of when Verisign may place a domain name registration in a "serverHold" status when a registration or bulk transfer is made without the required RNVCs necessary to demonstrate compliance with the local law compliance directives of a particular jurisdiction. We understand that pursuant to ICANN's January 28, 2022 letter, ICANN has reviewed these changes and did not identify any significant competition, security or stability issues, or the need for a contract amendment. Thank you for your attention in this matter and we look forward to receipt of the Free to Deploy letter.

Sincerely,

A handwritten signature in blue ink that reads "Patrick S. Kane".

Patrick S. Kane  
Senior Vice President  
Naming and Directory Services  
VeriSign, Inc.