



CMLS
Council of Multiple Listing Services

April 4, 2012

Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

RE: Canadian Real Estate Association's community application for .mls top level domain

Ladies and Gentlemen:

The Council of Multiple Listing Services (CMLS) is submitting this letter in full support of the community application of the Canadian Real Estate Association (CREA) to operate the .MLS top-level domain.

CMLS was formed over fifty years ago in 1957, as the Northwest Council of MLS. The three founding members of Northwest Council recognized the need to share ideas, service models and management concepts. The brainstorm of these MLS leaders evolved into a volunteer-led organization with a current membership of approximately 250 organizations that stretches across all of North America. In fact, for North American MLS professionals, CMLS is the only information-sharing organization that is solely dedicated to strengthening the MLS industry.

The primary purpose of an MLS is to provide a facility to publish an offer of compensation by a listing broker to other broker participants in that MLS. Since the commission information for a transaction and the property features are contained in the MLS system, it is in the best interests of the broker participants (and thereby the public) to maintain accurate and timely data.

In North America, consumers have come to understand the three letters "M L S" to represent the gold standard for accurate, up-to-date property information. However, of the millions of references to 'MLS' listing sites currently on the Internet, very few are actually true MLS organizations, and many contain inaccurate or incomplete information. In the United States, MLS Domains Association (MDA) was formed precisely to address this concern and create a safe haven on the Internet for the MLS community. CREA, as the owner of the MLS® trademark in Canada, represents the MLS community there. Now, MDA has joined CREA as a foreign affiliate member, permitting MDA to manage .MLS in the U.S. while CREA manages it in Canada, both according to strict eligibility requirements intended to connect consumers with reliable information from true MLSs. Specifically, each registrant of any .MLS second-level domain (SLD) in the U.S. must be a member of MDA, and only true MLSs are eligible. (In the U.S., MLSs are legal entities that aggregate, maintain, and distribute listing data among real estate brokers and appraisers, that support offers of compensation among brokers, that are operated for the benefit of participating brokers, and that are representative of at least one geographical market. In Canada, only members of CREA will be eligible to use .MLS domains. Further, in the U.S. MDA's Policy Guide provides for the adoption of procedures for assessing any claim that a member has violated its



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policies, is ineligible for membership in MDA, or has registered or is using any .MLS domain in a manner inconsistent with such policies; these measures ensure this name space stays true to the MLS community. CREA will manage similar policies for .MLS in Canada.

MLS Domains Association has already acquired fifty-five (55) MLSs from across the U.S. as members. Those members represent more than 600,000 brokers/agents, more than half the brokers/agents who belong to the National Association of REALTORS®, the industry's largest trade group. Each of MDA's members has committed meaningful financial support to the Association for its application to ICANN. That CREA and MDA have developed such support before CREA has even applied to operate the .MLS top-level domain speaks volumes to both the necessity for such a TLD and the confidence the MLS community has that CREA and MLS Domains Association best represents their interests. The Council of MLSs therefore strongly supports CREA's application to ICANN.

We thank you for your time and consideration.

Sincerely,

Gregory Manship
2012 President
Council of Multiple Listing Services