



April 10, 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 MLS Domains Association (MDA) 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.

MDA was formed in 2010 as a non-profit association of real estate multiple listing services in the United States, the sole purpose of which is to obtain or obtain a license to use, manage, and promote the use of the .MLS top-level domain on the Internet. MDA has over 50 U.S. real estate multiple listing services as its members, and they represent more than 600,000 real estate agents in the brokers in the U.S. who use multiple listing services every day. That represents more than half the population of MLS subscribers in the U.S. Each MDA member organization has committed dues (between \$500 and \$13,000) each year of MDA's existence, and MDA members have committed \$800 per domain in advance to register their interest in over 250 second-level domains on .MLS. This level of representation and commitment permits MDA to claim to fully represent the multiple listing service industry in the U.S.

In a complementary way, CREA fully represents the Multiple Listing Service® in Canada. There, the brands "MLS®" and "Multiple Listing Service®" designate the services of the members of CREA. Under an agreement with CREA, MDA is a foreign affiliate member of CREA.

In the U.S., 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.



Similarly, in Canada, the trademark MLS® identifies professional services rendered by members of CREA to affect the purchase and sale of real estate as part of a cooperative selling system. Those cooperative selling systems are called MLS® Systems, which include an inventory of listings of participating REALTORS®, where there is an offer of compensation from the listing agent to cooperating agents, and ensures a certain level of accuracy of information, professionalism and cooperation among REALTORS® to affect the purchase and sale of real estate.

In North America, consumers have come to understand the three letters “MLS” 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 real estate boards and associations that operate MLS® Systems 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 MLS Domains Association and only true MLSs (i.e., legal entities that aggregate, maintain, and distribute listing data among real estate brokers and appraisers and 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) may be Members thereof. In Canada, only members of CREA will be eligible to use .MLS domains. Further, in the U.S. MLS Domains Association’s Policy Guide provides for the adoption of procedures for assessing any claim that a Member has violated its policies, is ineligible for membership in MLS Domains Association, or has registered or is using any .MLS domain in a manner inconsistent with such policies to ensure this name space stays true to the MLS community. CREA will manage similar policies for .MLS in Canada.

Together, CREA and MDA will manage the .MLS top-level domain in a fashion that supports a thriving real estate industry, for the benefit of both organizations’ members, the MLS community, and for the benefit of consumers, who seek reliable real estate information.

To reiterate, MDA strongly supports the application of CREA to operate the .MLS top-level domain on behalf of the MLS community. We thank you for your time and consideration.



Sincerely,
MLS DOMAINS ASSOCIATION

A handwritten signature in black ink, appearing to read "Brian N. Larson".

By Brian N. Larson, Corporate Secretary