



Secretary of State

Jason M. Gant

State Capitol | 500 East Capitol Avenue | Pierre, South Dakota 57501 | sdsos@state.sd.us | sdsos.gov

March 30, 2012

Shaul Jolles
DOT Registry
208 W. 19th Street
Kansas City, MO

RE: ICANN gTLD evaluation process

Dear Mr. Jolles:

I am the Secretary of State of South Dakota. I also serve as the chairman of the Business Services Committee for the National Association of Secretaries of State (NASS). NASS membership is comprised of the Secretaries of State and Lt. Governors of the 50 states and territories. The majority of our members are responsible for the administrative oversight of various business entity registration processes in their respective states, including the registration of corporations and partnerships.

As you know, our office has been working closely with your organization with respect to policy decisions surrounding the issuance of the "strings" ".INC", ".CORP", ".LLP" and ".LLC" as part of the Internet Corporation for Assigned Names and Numbers's (ICANN) New Generic Top-Level Domain ("gTLD") Program. I believe if ICANN is to grant such top-level domains, it must be to a responsible registry operator, and operated in a restrictive manner to permit only qualified registrants into the domain, will greatly enhance the credibility and trustworthiness to both Internet users and South Dakota corporations. Therefore, if ICANN is in fact going to issue gTLD, South Dakota supports the application for the issuance of these "strings" if they are issued to a restrictive registry, planning to implement restrictions, as proposed by DOT Registry, to eligibility, including measures to authenticate the active status of all corporations seeking to register a second-level domain within the TLD.

Separately, the Executive Board of NASS has forwarded a letter to ICANN that was submitted by the Business Services committee. All of the extensions heretofore referenced are recognized under state law as a means of identifying various types of business entities here in the United States. The members of NASS believe these

Administration
Tel: (605) 773-3537
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Corporations
Tel: (605) 773-4845
Fax: (605) 773-4550

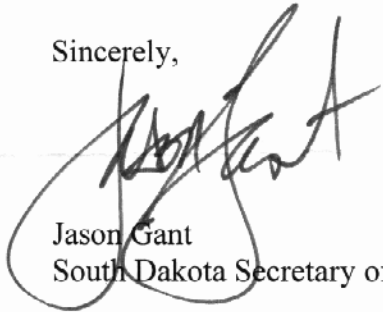
Uniform Commercial Code
Tel: (605) 773-4422
Fax: (605) 773-4550

extension identifiers, if granted, should only be extended to entities that are also legally and appropriately registered with the Secretaries of State, or the equivalent state agency. The referenced letter is attached.

Should Dot Registry propose to make any changes to the proposed registration policies in the future, I agree to be consulted as a policy advisor to ensure any proposed changes are in the best interest of our community before they are implemented.

Also enclosed is the official letter approved by NASS regarding gTLD.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Gant", is written over a circular stamp or seal. The signature is fluid and cursive.

Jason Gant
South Dakota Secretary of State

Enclosure



NASS
National Association
of Secretaries of State

March 30, 2012

Mr. Rod Beckstrom
President & CEO
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

re: New gTLD Program

Dear Mr. Beckstrom:

The National Association of Secretaries of State (NASS) is an organization whose members include the Secretaries of State and Lieutenant Governors of the 50 states and territories. Many of our members are responsible for the administrative oversight of various business entity registration processes in their respective states.

We understand that the Internet Corporation for Assigned Names and Numbers (ICANN) is now accepting applications for a new expanded top level domain name program. We also understand that extensions such as .INC, .LLC, .CORP, and .LLP may be under consideration as new top level domain names.

While we have concerns about the use of these extensions, if ICANN considers approving these extensions, our members respectfully request that they be approved with restrictions that would attempt to protect legitimate businesses and consumers from confusion or fraud. All of the extensions heretofore referenced are recognized under state law as a means of identifying various types of business entities here in the United States. Therefore it is important to ensure that the website domain name for a business entity has some amount of fidelity when compared to the businesses legal registration with the state. We would point to .EDU as a good example of how effective restrictions on internet domain extensions can add to consumer confidence and trust.

The members of NASS believe these extension identifiers (.INC, .LLC, .CORP, .LLP) should only be extended to entities that are also legally and appropriately registered with the Secretaries of State, or the equivalent state agency. The entity purchasing a new domain name should be the same entity registered with a Secretary of State or equivalent state agency.

For the past few months, the members of the NASS Business Services Committee have been working to familiarize themselves with the new ICANN program and reviewing the potential impact these new extensions would have on existing and new businesses registering with the Secretary of State.

Hall of States, 444 N. Capitol Street, N.W., Suite 401, Washington, DC 20001
(202) 624-3525 (202) 624.3527 Fax
www.nass.org

We feel it is important that NASS members be consulted by DOT Registry or other applicants regarding policy related to the registering and identifying of businesses as this process moves forward. Please feel free to contact Ms. Leslie Reynolds, NASS Executive Director with any questions at 202-624-3525.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth Chapman", with a long horizontal flourish extending to the right.

Beth Chapman
Alabama Secretary of State
President, National Association of Secretaries of State

cc: Jamie Hedlund, ICANN Vice President of Government Affairs

Hall of States, 444 N. Capitol Street, N.W., Suite 401, Washington, DC 20001
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www.nass.org



STATE OF DELAWARE
DEPARTMENT OF STATE

JEFFREY W. BULLOCK
SECRETARY OF STATE

March 20, 2012

ICANN
Attn: gTLD Program
4676 Admiralty Way
Suite 330
Marina del Rey, CA 90292-6601

To Whom It May Concern:

As Delaware's Secretary of State, I administer the State's company registry and am responsible for protecting the integrity of Delaware's legal entity registration system. Nearly one million legal entities, such as corporations and limited liability companies, (LLC) are organized in the United States under the laws of the State of Delaware.

The State of Delaware is the legal domicile of 63% of Fortune 500 companies, 55% of the firms listed on the two major U.S. stock exchanges, and 80% of new initial public offerings in the United States. Delaware is also the legal home to many of America's largest private-held and non-profit companies and hundreds of thousands of subsidiaries and affiliates of major companies around the world.

I understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new generic Top Level Domain (gTLD) name extensions this year. I have been informed that at least one firm – DOT Registry LLC – and possibly several other firms, plan to apply for the strings ".INC", ".CORP", ".LLC" and other potentially related extensions that state registries define as "company endings".

I join a chorus of federal and state officials who urge ICANN to proceed cautiously and deliberately in any approvals of new gTLDs. Delaware's view is that the granting of such name extensions creates a number of public policy issues and concerns – not the least of which is increasing the potential for fraud and abuse. As such, it is absolutely critical that if ICANN determines to grant such name extensions, that it does so in a restricted manner that is intended to protect consumers and the community of interest that exists among validly registered U.S. companies and my fellow State secretaries of state and other State company registrars that are responsible for administering the nation's legal entity registration system.

TOWNSEND BUILDING
401 FEDERAL STREET, SUITE 3
DOVER, DE 19901
(302) 739-4111
FAX: (302) 739-3811

CARVEL STATE OFFICE BUILDING
820 FRENCH STREET, FOURTH FLOOR
WILMINGTON, DE 19801
(302) 577-8767
FAX: (302) 577-2694

ICANN – gTLD program
March 20, 2012

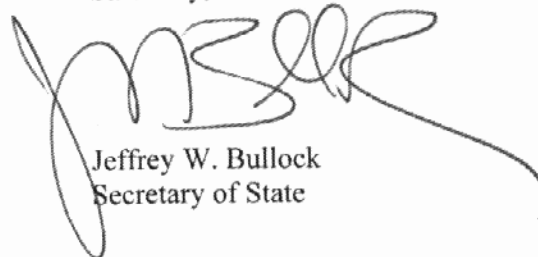
I therefore request that ICANN reject any request for the unrestricted use of “.INC”, “.LLC”, “.LLP”, “.CORP”, “.BANK”, “.TRUST” or similar commonly used company endings in the United States. The State of Delaware will object to the granting of such strings without restrictions.

I further request that, at a minimum, any approval for company ending strings be restricted in such a way that reasonably assures that the legal entity is, in fact, an active and validly registered legal entity in the United States, as DOT Registry LLC has proposed within its application. Specifically, any firm awarded the responsibility of administering such strings should be required to confirm whether the legal entity is validly formed according to criteria and documentation established by the states, and be required to check annually at renewal that the entity remains validly registered and actively in good standing according to criteria and documentation established by the states. The restrictions should further require that the homepage of such websites provide a mechanism that provides for the disclosure of the jurisdiction in which the entity is legally domiciled or include a geographic tag within the website name.

In order to reduce the risk of fraudulent activity, Delaware law places additional restrictions on the use of words such as “bank” and “trust” that are commonly associated with financial institutions. I therefore urge ICANN to seriously consider comment letters that have been submitted by the American Bankers Association and others urging ICANN to reject or place very significant restrictions on applications for the use of name extensions such as “.BANK” and “.TRUST”.

If you have any questions, please contact me or Richard J. Geisenberger, Chief Deputy Secretary of State, at 302-739-4111. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'JBullock', with a long horizontal flourish extending to the right.

Jeffrey W. Bullock
Secretary of State

cc: Richard J. Geisenberger, Chief Deputy Secretary of State
Leslie Reynolds, Executive Director, National Association of Secretaries of State

KRIS W. KOBACH
Secretary of State



Memorial Hall, 1st Floor
120 S.W. 10th Avenue
Topeka, KS 66612-1594
(785) 296-4575
www.sos.ks.gov

STATE OF KANSAS

February 7, 2012

Dot Registry
208 W 19th St
Kansas City, Missouri 64108

Subject: Letter of support for the Restricted Use of the Top Level Domains, ".INC"
and ".LLC"

Ladies and Gentlemen:

This letter confirms that the State of Kansas, Office of the Secretary of State, is charged with administering Kansas's database of registered business entities. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC" with restrictions that are intended to protect U.S. companies and consumers.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a secretary of state or equivalent agency. It is important that registry companies provide access to the information provided by registered companies for jurisdictional purposes. Our office believes that such restrictions are integral to these strings and will object to the use of the strings, ".INC" and ".LLC" without any restrictions.

Sincerely,

A handwritten signature in black ink that reads "Kris W. Kobach".

Kris W. Kobach
Secretary of State



State of North Carolina
Department of the Secretary of State

ELAINE F. MARSHALL
SECRETARY OF STATE

February 13, 2012

Dot Registry
208 W 19th St
Kansas City, MO 64108

Dear Ladies and Gentlemen:

This letter advises that the Department of the Secretary of State of North Carolina is charged with overseeing the business formation process for the formation of corporations, limited liability companies (LLCs), non-profit companies, professional associations, and several other types of business structures, as well as the maintenance of North Carolina's database relating to the aforementioned business entities. The businesses registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers (ICANN) will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC" with restrictions that are intended to protect U.S. companies and consumers that are registered with their state's administrator.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a Secretary of State or equivalent agency. I believe that entities not appropriately registered and maintained in any state should be prohibited from strings that would misrepresent their existence. As most Secretaries of State are not equipped to verify legitimate entity existence, even though we maintain that information, the verification process should be a requirement, albeit not ours.

Sincerely,

Elaine F. Marshall



A. Ralph Mollis

Secretary of State

State of Rhode Island and Providence Plantations

February 10, 2012

DOT Registry, LLC
208 W 19th St
Kansas City, Missouri 64108

Subject: Letter of support for the Restricted Use of the Top Level Domains "INC"
and "LLC"

Ladies and Gentlemen:

This letter confirms that the State of Rhode Island, Office of the Secretary of State, is charged with monitoring corporate filings and protecting corporate registrations in the State of Rhode Island. The corporate entities registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC." with restrictions that are intended to protect U.S. companies that are registered with the Secretary of State.

We believe that such strings should only be issued to corporate entities that are registered with a Secretary of State. Our office believes that such a restriction is integral to these strings and would object to the use of the strings, "INC" and "LLC" without restrictions.

Sincerely,

A. Ralph Mollis
Secretary of State

State House

Room 217

Providence, RI 02903

Phone: 401-222-2357 ~ Fax: 401-222-1356





OFFICE OF THE IOWA SECRETARY OF STATE

February 6, 2012

Dot Registry
208 W 19th St
Kansas City, MO 64108

Subject: Letter of support for the Restricted Use of the Top Level Domains, ".INC" and ".LLC"

Ladies and Gentlemen:

This letter confirms that the Iowa Secretary of State's Office, is charged with administering Iowa's database of registered business entities. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC" with restrictions that are intended to protect U.S. companies and consumers. These types of requirements are necessary to protect U.S. companies and consumers from fraudulent and deceptive business practices.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a secretary of state or equivalent agency. Also, it is important that registry companies provide access to the information by registered companies for jurisdictional purposes. This letter is not an endorsement of DOT Registry, LLC, but is a statement that our office believes that such restrictions, as proposed by DOT Registry, are integral to these strings and we will object to the use of the strings, ".INC" and ".LLC" without any such restrictions.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Matt Schultz".

Matt Schultz,
Secretary of State
State Commissioner of Elections



STATE OF MINNESOTA
Office of the Minnesota Secretary of State
Mark Ritchie

February 1, 2012

Dot Registry
208 W. 19th St.
Kansas City, MO 64108

To Whom It May Concern:

This letter confirms that the State of Minnesota, Office of the Secretary of State, is charged with regulating and protecting Corporations registered in the State of Minnesota. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC." With restrictions that are intended to protect U.S. companies that are registered with the Secretaries of State.

We believe that such strings should only be issued to companies that are registered with a Secretary of State. Our office believes that such restrictions are integral to these strings and will object to the use of the strings, ".INC" and ".LLC." without restrictions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Ritchie", written over a horizontal line.

MARK RITCHIE
Secretary of State



STATE OF NEBRASKA

JOHN A. GALE
SECRETARY OF STATE

P.O. Box 94608
State Capitol, Suite 2300
Lincoln, NE 68509-4608
Phone 402-471-2554
Fax 402-471-3237
www.sos.state.ne.us

February 3, 2012

Dot Registry
208 W 19th St
Kansas City, Missouri 64108

Subject: Letter of support for the Restricted Use of the Top Level Domains, ".INC"
and ".LLC"

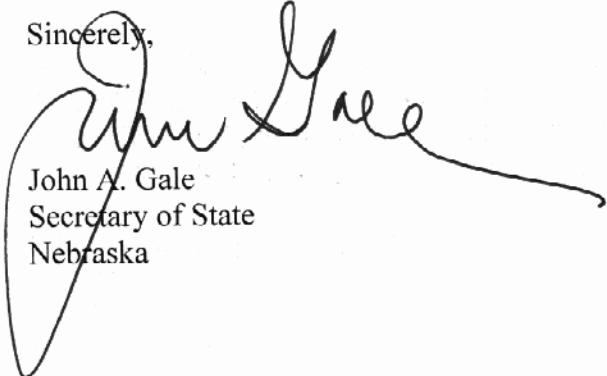
Ladies and Gentlemen:

This letter confirms that the State of Nebraska, Office of the Secretary of State, is charged with administering Nebraska's database of registered business entities. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers ("ICANN") will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, ".INC" and ".LLC" with restrictions that are intended to protect U.S. companies and consumers that are registered with the Secretary of State.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a secretary of state or equivalent agency. It is important that registry companies provide access to the information provided by registered companies for jurisdictional purposes. Our office believes that such restrictions are integral to these strings and will object to the use of the strings, ".INC" and ".LLC" without any restrictions.

Sincerely,



John A. Gale
Secretary of State
Nebraska



Secretary of State

Jason M. Gant

State Capitol | 500 East Capitol Avenue | Pierre, South Dakota 57501 | sdsos@state.sd.us | sdsos.gov

February 27, 2012

Dot Registry
208 W 19th St
Kansas City, Missouri 64108

Subject: Letter of support for the Restricted Use of the Top Level Domains, “.INC.”; “.LLC”, “.LLP” and “.CORP.”

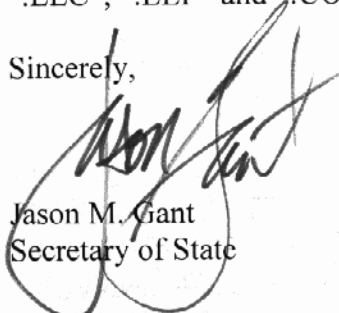
Ladies and Gentlemen:

This letter confirms that the State of South Dakota, Office of the Secretary of State, is charged with administering South Dakota's database of registered business entities. The companies registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers (“ICANN”) will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, “.INC”, “.LLC”, “.LLP” and “.CORP” with restrictions that are intended to protect U.S. companies and consumers that are registered with the Secretary of State.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with a secretary of state or equivalent agency. It is important that registry companies provide access to the information provided by registered companies for jurisdictional purposes. Our office believes that such restrictions are integral to these strings and will object to the use of the strings, “.INC”, “.LLC”, “.LLP” and “.CORP” without any restrictions.

Sincerely,


Jason M. Gant
Secretary of State

Administration

Tel: (605) 773-3537
Fax: (605) 773-6580

Corporations

Tel: (605) 773-4845
Fax: (605) 773-4550

Uniform Commercial Code

Tel: (605) 773-4422
Fax: (605) 773-4550



ROBIN CARNAHAN
SECRETARY OF STATE
STATE OF MISSOURI

STATE CAPITOL
ROOM 208
(573) 751-2379

JAMES C. KERRATRICK
STATE INFORMATION CENTER
(573) 751-4936

February 24, 2012

DOT Registry
208 W. 19th Street
Kansas City, MO 64108

Dear Ladies and Gentlemen:

This letter advises that the Secretary of State of Missouri is charged with overseeing the business formation process for the formation of corporations, limited liability companies (LLCs), non-profit companies, professional associations, and several other types of business structures, as well as the maintenance of Missouri's database relating to the aforementioned business entities. The businesses registered with this office are members of the larger community of corporations authorized to conduct business in the United States.

We understand that the Internet Corporation for Assigned Names and Numbers (ICANN) will be accepting applications for new web extensions this year. This office has been informed that companies, such as DOT Registry, LLC, will be applying for the strings, "INC" and "LLC" with restrictions that are intended to protect U.S. companies and consumers that are registered with their state's administrator.

In the event ICANN decides to issue these strings and in order to further the public policy reasons for which entities file at the state level, we believe that such strings should only be issued to companies that are registered with the Secretary of State or equivalent agency. I believe that entities not appropriately registered and maintained in any state should be prohibited from strings that would misrepresent their existence. As most Secretaries of State are not equipped to verify legitimate entity existence, even though we maintain that information, the verification process should be a requirement, albeit not ours.

Very truly yours,

A handwritten signature in black ink that reads "Robin Carnahan".

Robin Carnahan
Secretary of State

ALVIN A. JAEGER
SECRETARY OF STATE

HOME PAGE www.nd.gov/sos



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E-MAIL sos@nd.gov

SECRETARY OF STATE
STATE OF NORTH DAKOTA
600 EAST BOULEVARD AVENUE DEPT 108
BISMARCK ND 58505-0500

March 23, 2012

Internet Corporation for Assigned Names and Numbers
1101 New York Avenue NW Suite 930
Washington DC 20005

To Whom it May Concern:

As the Secretary of State, I have the administrative oversight of various business entity registrations filed in my state.

It is my understanding that your organization (ICANN) is now accepting applications for a new expanded top level domain name program. I have learned that extensions such as .INC, .LLC, .LLP, and .CORP may be under consideration and that is of significant concern to me.

If ICANN considers approving these extensions, I respectfully request that they be approved and awarded to a company that has submitted an application that includes restrictions they will abide by, which would provide all of the possible protection for legitimate businesses and consumers from confusion or fraud.

All of these mentioned extensions are recognized under North Dakota state law as a means of identifying various types of business entities that are legally filed with my office. Therefore, it is important to ensure that the website domain name being considered for a business entity is only extended to a business entity that has a corresponding legal registration identified with that domain name. These business entities, with their registration, have lawfully earned the right to use these entity identifiers. That right should not be infringed about by any company or individual that has not obtained the legal use of them through the registration process in one of the states.

Therefore, along with my fellow members of the National Association of Secretaries of State (NASS), I am of the opinion that these extension identifiers should only be extended to entities in their respective states that are legally and appropriately registered with the Secretary of State, or the equivalent state agency.

During the past several months, the NASS Business Services Committee (of which I am a member) has been considering the proposed ICANN program and has been reviewing the potential impact these new extensions would have on existing businesses and new businesses registering with the various states.

As one member of the committee, I believe it is fundamental that NASS be consulted by companies such as DOT Registry or any other applicants regarding policy related to the registering and identifying of businesses as this expanded program is considered by ICANN. And, if ICANN approves these extensions, the successful recipient will agree to extend the new extensions only to a "community" of businesses appropriately and legally registered in one of the various states.

Without having appropriate restrictions in place, I would strongly oppose approving these extensions and awarding them to any company.

Sincerely,

A handwritten signature in cursive script, appearing to read "Al Jaeger".

Al Jaeger
Secretary of State