

## ICANN:

Attached please find the Public Interest Commitments (PICs) by the following applicants, subsidiaries of Donuts. We support the PIC process as a manageable and voluntary vehicle to make commitments in our applications binding, per the request of the ICANN Government Advisory Committee (GAC). These PICs do not conflict with the content of our applications.

With regard to #1 in the draft PIC Specification 11, it should be amended as redlined below to remove the open-ended right of the ICANN Board to approve a new form of the Registrar Accreditation Agreement at any point in the next 10 years with or without support of the other party to the agreement, and prohibiting us from providing registration services through any registrar that does not sign such agreement. As detailed in public comments, that is an over-reach and is not consistent with the multi-stakeholder model. With that said, we do not object to working with only those registrars that sign the 2013 RAA within a reasonable time period after it is approved by the ICANN Board, if it is in a form reasonably acceptable to the Registrar Stakeholder Group. We understand that the parties are close to achieving an approved agreement and we encourage them to do so forthwith.

We also provide these PICs cognizant that ICANN has not yet proposed any details of the PIC Dispute Resolution Policy (PICDRP) that would govern the enforcement of the PICs. We provide our PICs with the understanding that ICANN will provide an acceptable PICDRP.

Finally, we would like to reserve the right to supplement these PICs with additional commitments based on GAC and community feedback.

#### Jonathon Nevett

Co-Founder & EVP, Donuts Inc.

Applicant Name	Application No.	<u>TLD</u>	Applicant Name	Application No.	TLD
Half Oaks, LLC	1-1336-51768	academy	Half Hallow, LLC	1-1354-34421	bargains
Steel Falls, LLC	1-1339-13106	agency	Silver Pass, LLC	1-1353-23613	baseball
June Maple, LLC	1-1341-21066	apartments	Little Hollow, LLC	1-1355-53565	basketball
Lone Maple, LLC	1-1343-89689	арр	Romeo Corner, LLC	1-1356-74155	beauty
Baxter Tigers, LLC	1-1344-70608	art	Foggy Way, LLC	1-1359-21671	bet
Baxter Hill, LLC	1-1345-27582	associates	Grand Hollow, LLC	1-1357-41903	bike
Sand Galley, LLC	1-1347-98883	auction	Sand Cedar, LLC	1-1360-70873	bingo
Big Maple, LLC	1-1351-20019	auto	Corn Shadow, LLC	1-1358-79189	blog
Auburn Beach, LLC	1-1352-18081	baby	Black Shadow, LLC	1-1362-58076	boats
Auburn Hollow, LLC	1-1350-42613	band	Over Galley, LLC	1-1363-29181	boutique

Goose North, LLC	1-1365-11798	broadway	Puff House, LLC	1-1418-57248	degree
Spring North, LLC	1-1364-8001	broker	Steel Station, LLC	1-1420-57575	delivery
Atomic Madison, LLC	1-1366-121	builders	Black Avenue, LLC	1-1425-38025	design
Spring Cross, LLC	1-1367-68057	business	John Edge, LLC	1-1428-32844	diamonds
Bitter Sunset, LLC	1-1368-92181	buy	Pioneer Hill, LLC	1-1426-25607	diet
Half Sunset, LLC	1-1371-6431	cab	Dash Park, LLC	1-1427-39640	digital
Pioneer Canyon, LLC	1-1370-88467	cafe	Half Trail, LLC	1-1424-94823	direct
Atomic Maple, LLC	1-1372-58656	camera	Extra Madison, LLC	1-1432-79618	directory
Delta Dynamite, LLC	1-1373-83008	camp	Holly Hill, LLC	1-1431-6328	discount
Delta Mill, LLC	1-1375-20218	capital	Koko Mill, LLC	1-1429-22494	dog
Foggy Hollow, LLC	1-1376-34668	cards	Sugar Cross, LLC	1-1433-39728	domains
Goose Cross, LLC	1-1374-92093	care	Little Birch, LLC	1-1434-1370	eco
Wild Corner, LLC	1-1378-74207	careers	Brice Way, LLC	1-1435-73490	education
Koko Castle, LLC	1-1377-8759	cars	Spring Madison, LLC	1-1438-98374	email
Extra Way, LLC	1-1379-61100	casa	Binky Birch, LLC	1-1437-42738	energy
Delta Lake, LLC	1-1381-76948	cash	Romeo Canyon, LLC	1-1436-74788	engineering
Binky Sky, LLC	1-1382-33633	casino	Snow Oaks, LLC	1-1440-71720	enterprises
New Falls, LLC	1-1380-59591	catering	Corn Station, LLC	1-1442-68106	equipment
Tin Mill, LLC	1-1383-13918	center	Trixy Park, LLC	1-1441-44965	estate
Sand Fields, LLC	1-1385-24288	chat	Pioneer Maple, LLC	1-1443-27992	events
Sand Cover, LLC	1-1388-22552	cheap	Spring Falls, LLC	1-1445-68403	exchange
Holly Fields, LLC	1-1387-59691	church	Magic Pass, LLC	1-1444-46322	expert
Snow Sky, LLC	1-1389-12139	city	Victor Beach, LLC	1-1446-82057	exposed
Fox Shadow, LLC	1-1391-32771	cleaning	Sea Sunset, LLC	1-1447-46365	express
Steel Lake, LLC	1-1394-96113	clothing	Atomic Pipe, LLC	1-1448-73190	fail
Dash Cedar, LLC	1-1393-18458	cloud	Bitter Galley, LLC	1-1450-96002	family
Koko Manor, LLC	1-1396-86079	club	Goose Glen, LLC	1-1449-26710	fan
Trixy Cover, LLC	1-1401-49222	coffee	Just Maple, LLC	1-1451-8324	farm
Binky Edge, LLC	1-1400-95244	college	Big Dynamite, LLC	1-1455-48217	fashion
Fox Orchard, LLC	1-1402-32002	community	Just Cover, LLC	1-1453-71764	financial
Silver Avenue, LLC	1-1399-64977	company	Fox Woods, LLC	1-1459-49079	fish
Pine Mill, LLC	1-1405-67595	computer	Brice Orchard, LLC	1-1457-79967	fitness
Pine House, LLC	1-1404-98894	condos	Fox Station, LLC	1-1460-3791	flights
Fox Dynamite, LLC	1-1403-98045	construction	Half Cypress, LLC	1-1456-34878	florist
Pixie Station, LLC	1-1406-80949	consulting	Fern Willow, LLC	1-1458-34042	flowers
Magic Woods, LLC	1-1408-96304	contractors	Wild Orchard, LLC	1-1462-36448	food
Koko Lake, LLC	1-1409-69124	cool	Foggy Farms, LLC	1-1463-19656	football
Black Island, LLC	1-1413-96740	coupons	Sea Oaks, LLC	1-1461-35653	forsale
Little Cover, LLC	1-1414-81052	cricket	June Hollow, LLC	1-1464-71170	forum
Spring Way, LLC	1-1415-46513	cruises	John Dale, LLC	1-1468-64201	foundation
Romeo Birch, LLC	1-1605-75916	data	Lone Fields, LLC	1-1466-60532	furniture
Pine Fest, LLC	1-1416-56404	dating	Atomic Falls, LLC	1-1469-89174	futbol
Sand Sunset, LLC	1-1419-43874	deals	Silver Tigers, LLC	1-1579-33517	fyi

Sugar House, LLC	1-1471-10955	gallery	Dog Beach, LLC	1-1563-40885	memorial
Brice Maple, LLC	1-1472-69003	garden	Pixie North, LLC	1-1566-85057	mobile
Goose Sky, LLC	1-1474-76888	gifts	Outer McCook, LLC	1-1567-79679	money
Black Cover, LLC	1-1475-74719	glass	Trixy Manor, LLC	1-1572-10553	network
Goose Falls, LLC	1-1473-54534	global	Hidden Bloom, LLC	1-1573-27315	news
June Edge, LLC	1-1478-71326	gold	Grand Turn, LLC	1-1575-53902	now
Lone Falls, LLC	1-1476-38656	golf	Bitter Frostbite, LLC	1-1574-83272	online
Over Madison, LLC	1-1479-5306	graphics	Magic Glen, LLC	1-1576-29395	partners
Corn Sunset, LLC	1-1486-63504	gripe	Sea Goodbye, LLC	1-1577-85976	parts
Romeo Town, LLC	1-1482-30833	group	John Island, LLC	1-1578-44109	pets
Snow Moon, LLC	1-1484-33046	guide	Wild Frostbite, LLC	1-1582-80831	phone
Pioneer Cypress, LLC	1-1487-73268	guru	Sugar Glen, LLC	1-1581-70192	photography
Pixie Edge, LLC	1-1488-15641	haus	Sea Corner, LLC	1-1580-67148	photos
Pioneer Gardens, LLC	1-1499-91633	help	Foggy Sky, LLC	1-1585-29698	pictures
Half Willow, LLC	1-1493-98462	hockey	Foggy Moon, LLC	1-1583-6697	pizza
John Madison, LLC	1-1496-1524	holdings	Snow Galley, LLC	1-1584-14507	place
Goose Woods, LLC	1-1497-56699	holiday	Spring Tigers, LLC	1-1586-62771	plumbing
Baxter Pike, LLC	1-1494-83305	home	Sugar Mill, LLC	1-1589-56456	plus
Trixy Birch, LLC	1-1507-65003	hosting	Binky Mill, LLC	1-1587-4615	poker
Auburn Hill, LLC	1-1498-82780	hot	Magic Birch, LLC	1-1590-83448	productions
Spring McCook, LLC	1-1500-16803	hotel	Big Pass, LLC	1-1588-73251	properties
Sugar Park, LLC	1-1506-83794	house	Steel Goodbye, LLC	1-1592-63879	property
Auburn Bloom, LLC	1-1511-99612	immo	Black Orchard, LLC	1-1594-21696	racing
Outer House, LLC	1-1510-3058	industries	Tin Dale, LLC	1-1593-8224	radio
Outer Maple, LLC	1-1514-76062	institute	New North, LLC	1-1597-13898	realestate
Wild Way, LLC	1-1513-9603	international	Dash Bloom, LLC	1-1598-77594	realty
Wild Bloom, LLC	1-1520-93221	jewelry	Grand Island, LLC	1-1603-97736	recipes
Just Goodbye, LLC	1-1526-71442	kitchen	Steel Keep, LLC	1-1595-97277	red
Pine Moon, LLC	1-1525-41533	land	New Cypress, LLC	1-1606-68851	reisen
Victor Trail, LLC	1-1540-49920	lease	Pearl Town, LLC	1-1604-36499	rent
John McCook, LLC	1-1539-6233	lighting	Big Hollow, LLC	1-1600-90191	rentals
Big Fest, LLC	1-1542-96415	limited	Lone Sunset, LLC	1-1611-39225	repair
Hidden Frostbite, LLC	1-1543-47454	limo	Binky Glen, LLC	1-1615-74729	report
Outer Way, LLC	1-1547-37710	living	Snow Avenue, LLC	1-1610-3807	restaurant
Hidden Cypress, LLC	1-1549-37731	love	Extra Cover, LLC	1-1607-34771	reviews
Dash Tigers, LLC	1-1551-91953	luxury	Ruby Moon, LLC	1-1131-85666	rocks
Victor Dale, LLC	1-1548-63140	mail	Atomic Cross, LLC	1-1612-2805	rugby
Victor Frostbite, LLC	1-1552-8006	maison	Snow Park, LLC	1-1616-69474	run
John Goodbye, LLC	1-1555-40996	management	Half Bloom, LLC	1-1617-57149	sale
Victor Way, LLC	1-1553-52336	market	Outer Orchard, LLC	1-1618-18834	salon
Fern Pass, LLC	1-1557-30317	marketing	Little Galley, LLC	1-1622-67844	school
Lone Hollow, LLC	1-1556-47497	mba	Outer Moon, LLC	1-1627-1624	schule
Grand Glen, LLC	1-1560-69674	media	Bitter McCook, LLC	1-1626-61742	search

Fern Trail, LLC	1-1625-43519	security	Pioneer North, LLC	1-1653-6258	tools
Fox Castle, LLC	1-1628-41321	services	Sugar Station, LLC	1-1648-61876	tours
Binky Galley, LLC	1-1630-4186	shoes	Koko Moon, LLC	1-1655-79604	town
Sugar Maple, LLC	1-1632-57390	shop	Pioneer Orchard, LLC	1-1650-66027	toys
Sea Tigers, LLC	1-1631-16988	shopping	Little Manor, LLC	1-1654-94203	trading
Snow Beach, LLC	1-1633-36635	show	Wild Willow, LLC	1-1652-41660	training
Fern Madison, LLC	1-1634-15520	singles	Boss Castle, LLC	1-1656-46642	tube
Corn Mill, LLC	1-1637-12997	site	Little Station, LLC	1-1651-77163	university
Wild Lake, LLC	1-1636-27531	ski	Atomic Tigers, LLC	1-1647-84596	vacations
Foggy Shadow, LLC	1-1635-18982	soccer	Binky Lake, LLC	1-1649-44756	ventures
Ruby Town, LLC	1-1623-664	solar	Wild Dale, LLC	1-1642-14231	vet
Silver Cover, LLC	1-1620-15722	solutions	Black Madison, LLC	1-1629-12298	viajes
Foggy Sunset, LLC	1-1619-92115	spa	New Sky, LLC	1-1537-30547	villas
Steel Edge, LLC	1-1614-27785	sports	Holly Shadow, LLC	1-1538-23177	vin
Extra Beach, LLC	1-1613-64465	storage	John Corner, LLC	1-1532-71538	vip
Sand Dale, LLC	1-1609-60839	store	Koko Station, LLC	1-1533-53706	vision
Spring Goodbye, LLC	1-1608-9291	studio	Double Falls, LLC	1-1530-99208	vote
Binky Moon, LLC	1-1602-30813	style	Ruby House, LLC	1-1529-46197	voyage
Dog Bloom, LLC	1-1596-35125	sucks	Sand Shadow, LLC	1-1528-66412	watch
Atomic Fields, LLC	1-1601-42282	supplies	Ruby Glen, LLC	1-1527-54849	web
Half Falls, LLC	1-1591-23028	supply	Fern Edge, LLC	1-1524-44846	website
Grand Orchard, LLC	1-1568-22230	support	Wild Madison, LLC	1-1519-43980	wedding
Dash Cypress, LLC	1-1565-27165	systems	June Station, LLC	1-1515-14214	wine
Pine Falls, LLC	1-1558-74769	taxi	Little Dynamite, LLC	1-1518-50195	works
Atomic Lake, LLC	1-1559-19356	team	Bitter Fields, LLC	1-1504-13424	world
Lone Moon, LLC	1-1554-19894	tech	Hidden Way, LLC	1-1508-57100	wtf
Auburn Falls, LLC	1-1639-5968	technology	Victor Falls, LLC	1-1502-54392	yoga
Cotton Bloom, LLC	1-1640-29241	tennis	Outer Falls, LLC	1-1503-89379	zone
Blue Tigers, LLC	1-1641-67063	theater	Dash McCook, LLC	1-1495-41000	企业
Atomic McCook, LLC	1-1638-77826	tickets	Wild Island, LLC	1-1490-59840	商店
Victor Manor, LLC	1-1646-17411	tienda	Will Bloom, LLC	1-1491-83816	娱乐
Corn Willow, LLC	1-1644-52968	tips	Spring Fields, LLC	1-1485-72605	游戏
Dog Edge, LLC	1-1645-45928	tires			

### SPECIFICATION 11 PUBLIC INTEREST COMMITMENTS

1. Registry Operator will use only ICANN accredited registrars that are party to the Registrar Accreditation Agreement approved by the ICANN Board of Directors on \_\_\_\_\_\_, 2013 <u>(or any subsequent form of Registrar Accreditation Agreement approved by the ICANN Board of Directors)</u> in registering domain names. A list of such registrars shall be maintained by ICANN on ICANN's website.

2. □ Registry Operator will operate the registry for the TLD in compliance with all commitments, statements of intent and business plans stated in the following sections of Registry Operator's application to ICANN for the TLD, which commitments, statements of intent and business plans are hereby incorporated by reference into this Agreement. Registry Operator's obligations pursuant to this paragraph shall be enforceable by ICANN and through the Public Interest Commitment Dispute Resolution Process established by ICANN ((posted at [url to be inserted when final procedure is adopted]), as it may be amended by ICANN from time to time, the "PICDRP"). Registry Operator shall comply with the PICDRP. Registry Operator agrees to implement and adhere to any remedies ICANN imposes (which may include any reasonable remedy, including for the avoidance of doubt, the termination of the Registry Agreement pursuant to Section 4.3(e) of the Registry Agreement) following a determination by any PICDRP panel and to be bound by any such determination.

# N/A

3. Registry Operator agrees to perform the following specific public interest commitments, which commitments shall be enforceable by ICANN and through the PICDRP. Registry Operator shall comply with the PICDRP. Registry Operator agrees to implement and adhere to any remedies ICANN imposes (which may include any reasonable remedy, including for the avoidance of doubt, the termination of the Registry Agreement pursuant to Section 4.3(e) of the Registry Agreement) following a determination by any PICDRP panel and to be bound by any such determination.

Registry Operator agrees to the following Public Interest Commitments (PICs), which shall apply to this gTLD

# 1. Open registration

Second-level registrations in this gTLD will be open and available to lawful registrants. This gTLD represents a generic or dictionary term, and registry operator accordingly will operate it in an inclusive manner. Registry Operator will not limit registrant eligibility based on identity nor restrict availability of second-level names to only registrants whose identity is associated only with the most common usage of the term. Registry Operator will not disenfranchise lawful users who are associated with a minority usage of the term.

# 2. Geographic name protection

Pursuant to Specification 5 of this Registry Agreement, Registry Operator will transmit to registrars the list of geographic names prohibited from second-level registration. Registry Operator will periodically review this list to ensure it is identical to that maintained by ICANN. Should Registry Operator seek to release these reserved names, it will consult with ICANN's Governmental Advisory Committee and obtain any permissions necessary from ICANN for such release.

#### 3. Rights Protection Mechanisms and Abuse Mitigation

- A. Registry Operator commits to implementing and performing the following protections for this gTLD:
- 3.1 In order to help registrars and registrants identify inaccurate data in the Whois database, Registry Operator will audit Whois data for accuracy on a statistically significant basis.

- 3.2 Work with registrars and registrants to remediate inaccurate Whois data to help ensure a more accurate Whois database. Registry Operator reserves the right to cancel a domain name registration on the basis of inaccurate data, if necessary.
- 3.3 Establish and maintain a Domains Protected Marks List (DPML), a trademark protection service that allows rights holders to reserve registration of exact match trademark terms and terms that contain their trademarks across all gTLDs administered by Registry Operator under certain terms and conditions.
- 3.4 At no cost to trademark holders, establish and maintain a Claims Plus service, which is a notice protection mechanism that begins at the end of ICANN's mandated Trademark Claims period.
- 3.5 Bind registrants to terms of use that define and prohibit illegal or abusive activity.
- 3.6 Limit the use of proxy and privacy registration services in cases of malfeasance.
- 3.7 Consistent with the terms of this Registry Agreement, reserve the right to exclude from distribution any registrars with a history of non-compliance with the terms of the Registrar Accreditation Agreement.
- 3.8 Registry Operator will be properly resourced to perform these protections.

#### 4. Anti-Abuse Policy

- 4.1 Registry Operator's Anti-Abuse Policy will be required under the Registry-Registrar Agreement and posted on the registry operator's web site.
- 4.2 Registry Operator will monitor the gTLD for abusive behavior and address it as soon as possible if detected.
- 4.3 Registry Operator reserves the right, at its sole discretion and at any time and without limitation, to deny, suspend, cancel, or transfer any registration or transaction, or place any domain name(s) on registry lock, hold, or similar status as it determines necessary for any of the following reasons:

4.3.1 to protect the integrity and stability of the registry;
4.3.2 to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process;
4.3.3 to comply with the terms of this Registry Agreement and the Registry Operator's Anti-Abuse Policy;
4.3.4 registrant fails to keep Whois information accurate and up-to-date;
4.3.5 domain name use violates the Registry Operator's acceptable use policies, or a third party's rights or acceptable use policies, including but not limited to the infringement of any copyright or trademark; or
4.3.6 as needed during resolution of a dispute.

4.4 <u>Abuse Point of Contact</u>. Registry Operator will provide an abuse point of contact (APOC). This contact will be a role-based e-mail address posted on the Registry Operator's web site in the form such as "abuse123@registry.tld". This e-mail address will allow multiple staff members to monitor and address abuse reports. Registry Operator will further provide a convenient web form for complaints.

These PICs shall be subject to review by Registry Operator starting in January 2016, and Registry Operator, in its sole discretion, may elect at that time to modify or discontinue any of the PICs herein in the case of a substantial and compelling business need.