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March 20, 2013

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Names and Numbers (“ICANN”)
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comments-base-agreement-05feb13@icann.org

**Re: Reply Comments in Support of Brian Winterfeldt’s Public Comments on
Necessary Changes to the Revised Registry Agreement including Additional
Public Interest Commitments Specification**

Dear Mr. Halloran:

Thank you for this initial opportunity to comment on the new gTLD Registry Agreement. Web.com Group, Inc. (“Web.com”) writes to voice its strong support for the public comments submitted by Brian J. Winterfeldt, Esq. and Steptoe & Johnson LLP on February 26, 2013 on behalf of several first-time new gTLD applicants.¹

Web.com has been in the business of helping our customers establish their online presence for over 15 years. Following our acquisition of Register.com in July 2010 and the subsequent acquisition of Network Solutions, LLC, the oldest ICANN accredited registrar, in October 2011, we have become one of the largest domain name registrars in the world with approximately 3 million customers. Web.com offers a variety of TLDs and a full suite of domain-name services, including registration, management, renewal, expiration protection and privacy services. Web.com’s services are thus heavily regulated and scrutinized by governmental authorities around the world, and Web.com must abide by stringent laws regarding data security, confidentiality, and privacy.

As a result, Web.com has implemented exacting industry-standard contract practices regarding any services it provides or outsources that involve data collection and/or sharing. After reviewing the current draft of the Registry Agreement, however, we agree with Mr. Winterfeldt that it contains many provisions that do not meet commercially reasonable standards for large, highly-regulated corporations such as Web.com.

¹ Steptoe & Johnson LLP, New gTLD Registry Agreement Public Comments, available at <http://forum.icann.org/lists/comments-base-agreement-05feb13/msg00042.html> (last visited March 1, 2013).

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Accordingly, we strongly urge ICANN to take the steps necessary to revise the draft Registry Agreement and ameliorate the significant issues identified in the public comments that were submitted by Brian J. Winterfeldt and Steptoe & Johnson LLP for the benefit of all applicants. This will reduce the need for applicants to engage in the extended negotiation of the Registry Agreement, which would ultimately delay the implementation of many TLDs.

In addition, ICANN should consider creating a separate BRAND Registry Agreement specifically designed for .BRAND TLDs as suggested in comments filed by the Brand Registry Group and others that incorporates the suggestions made in Mr. Winterfeldt's comments and is better tailored to that subsection of TLDs so that those registry operators understand better their rights and obligations under the Registry Agreement.

We thank you for your consideration of these reply comments.

Sincerely,

Robert C. Wiegand
Senior Vice President