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14 May 2013

FAO: New GTLD Board Committee

RE: GAC Beijing Communiqué

Accent Media is pleased to comment on the safeguards presented in the GAC Beijing Communiqué and thanks the Board for the opportunity.

As an applicant for the string "TICKETS" we would like to comment on the safeguard advice as it relates to our application, and in a more general sense to the new GTLD program as a whole.

We find much of the content of the broad safeguard areas to be reasonably within scope of our business model, especially when read alongside the many and varied rights protections mechanisms that are being considered by applicants including Accent Media.

Whilst we are also comfortable that we will work within the additional safeguards guidelines, we do not believe that the communiqué is the appropriate forum or device for delivering this level of control into the new GTLD program. This appears to be in direct contravention of the principles of the multi-stakeholder model that the GAC participates in. The role of the GAC within the new gTLD framework, and the remedies of both the GAC and ICANN were well established early in the program.

Our application to be the registry operator for "TICKETS" was founded by experts in the ticketing sector. We have the specific aim of reducing the annual multi-billion dollar fraudulent activity suffered by vulnerable internet users when attempting purchase tickets online for entertainment and sports events, travel and gaming such as lottery tickets.

Our business model is grounded in the firm belief that within certain sectors of online activity, both regulated and unregulated, users could benefit from the increased safety and security that operating a high-security TLD would offer. At the same time, increased consumer trust and confidence in previously uncertain sectors would provide benefits to those registrants that chose to participate in the high-security TLDs

As such, much of the GAC advice contained within the 6 broad safeguard areas are already explicitly incorporated into our proposal for registry operations as described fully in our application made in accordance with the Applicant

Guidebook and with the statements contained within our submitted Public Interest Commitment.

#### 1 – WHOIS Verification and Checks

As a TLD that is based on consumer trust with the remit of being open, secure and independent we will not tolerate incomplete, inaccurate or unverified WHOIS information.

#### 2 – Mitigating Abusive Activity

As described in our Public Interest Commitment Accent Media is firmly committed to the strongest possible pro-active measures to mitigate abusive activity in any form.

#### 3 – Security Checks

As part of our commitment to ensuring general fitness-for-purpose and ongoing trust within the internet user community and our registrant community, the security policy that we expect to be incorporated into our license agreements will include as stringent security and monitoring as is required to maintain our registry commitment to creating a safe environment for ticket sales and marketing.

#### 4 – Documentation

Standard management procedures will incorporate documentation at or beyond the level mentioned.

#### 5 – Making and Handling Complaints

As outlined in our application and emphasized in our PIC submission, we have a policy that will enable us to efficiently handle complaints submitted.

#### 6 – Consequences

In the event of a breach of any of the terms and condition of the registrant license, then a policy will be in place with clearly defined consequences. The decision process for the application of the policy will be handled by an appointed neutral 3<sup>rd</sup> party.

As described in our application we anticipate that many of the policies that address the concerns above will be generated, approved, and reviewed by industry committees representing the specific sectors that serve the internet users, rights holders, brand owners, and vendors we seek to work alongside in order to help make ticket purchase online a safer experience.

As an independent business, we chose to incorporate this level of security to our TLD application. The values that our business holds means that we are very comfortable with many of the operational implications of the Beijing Communiqué, and while many aspects remain open we voluntarily chose this path.

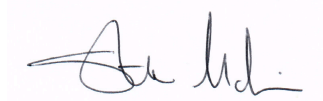
We chose to work with, and have the support of many organizations including, the music management community, the music festival community, the law

enforcement organizations that focus specifically on fraud, the travel organizations that deal with fraud, and the relevant consumer associations.

The important point here is that we chose to do this and have made our application based on the freedoms and restrictions made explicit in the applicant guidebook. All applicants were subject to the same restrictions at the point of application and if our reading of the communiqué is correct with regards to many of the recommendations the communiqué appears to be tantamount to additional and previously unforeseen controls being retroactively applied.

We trust that the board and the GAC will take up to their respective responsibilities in order to ensure that the new GTLD program stays on track for the sake not just of the fee paying applicants who are heavily invested in the positive outcomes of this new GTLD program but also for the wider development of the internet and the innovations that new gTLDs will bring.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Steve Machin", is centered on the page. The signature is written in a cursive style with a large initial 'S'.

Steve Machin

Accent Media – Founding Director