

NeuLevel .biz Proof of Concept Report to ICANN

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1. Introduction

The following Proof of Concept report covers the processes implemented by NeuLevel, Inc. to ensure the successful 2001 launch of the .biz gTLD, and highlights lessons learned. In this report, NeuLevel provides a candid assessment of the impact of those processes on the various participants in the process (Registrants, Registrars and Registry).

NeuLevel seeks to communicate to ICANN, accredited Registrars and other interested parties in the Internet community the positive aspects of our experience with .biz, and to address areas of concern. With the stated goals of remaining a trusted and neutral provider of Registry services and ensuring a strong and stable Internet environment in mind, NeuLevel has chosen to highlight not just the many successful developments surrounding the .biz launch, but the challenges as well.

NeuLevel expects that the .biz Proof of Concept report, with its candid and straightforward approach, will serve as a “road map” for the successful launch of future gTLDs. It will show the safest and clearest paths to success, while also pointing out roads to be avoided.

NeuLevel welcomes any and all questions or comments that this report may generate. Please direct all inquiries and/or feedback to Keith Drazek, NeuLevel Registry Relations Manager, via email to poc-comments@neulevel.biz.

2. Definitions and Acronyms Used

TLD	Top Level Domain (e.g., .biz, .info, .com, .net, .org)
IP Claim	Intellectual Property Claim (used in Phase 1 of .biz launch), also referred to as “Trademark Claim Form” in the .biz Registry Agreement. Established to help individuals and companies protect their trademarks and service marks during the launch of the .biz TLD by enabling them to stake a claim to a domain name prior to the commencement of service and live registrations.
DNA	As part of part of Phase 2, Domain Name Applications (DNAs) were submitted by potential “landrush” Registrants through their Registrar of choice. DNAs included all the same information that would be submitted during a live domain registration.
RDNA	Re-cast Domain Name Applications (RDNAs) was the process used during the second randomization process for the Group 2b domain names affected by the Smiley lawsuit. “RDNA” was also used to refer to the DNA resubmitted for the Group 2b domains. RDNAs were re-submitted by applicants at no charge and were collected beginning in February 2002. Those RDNAs were checked against the IP Claim Database collected during Phase 1 to determine if there are any conflicts. In the event of a conflict, the owner of an RDNA had to affirmatively elect to proceed with the application. RDNA that either did not match an IP Claim, or hich matched an IP Claim, but the owner of the RDNA proceeded were randomized and selected for registration went live on April 8, 2002. There were a total of 597,528 RDNAs.

Launch Phases

Phase 1	Phase 1 was the period (May 21 - August 8, 2001) when IP Claim forms were collected by NeuLevel. During Phase 2, DNA were checked against the IP Claim Database. For all DNA that matched an IP Claim, a notice was sent to the owner of the DNA that there was a potential trademark conflict (see below). Filing an IP Claim during Phase 1 was separate and apart from filing a DNA during Phase 2.
Phase 2	Phase 2 was the period (May 25 - September 25, 2001) during which NeuLevel accepted Domain Name Applications (DNAs), matched the DNA submitted against the IP Claim Database, and notified all owners of DNA that matched IP Claims that there was a potential intellectual property conflict. It was also the period in which NeuLevel was supposed to conduct the randomization of multiple applications and allocate the domain names to the resulting applicants. However, Phase 2 became the subject of the Smiley litigation alleging an illegal lottery (see below). Therefore, aspects of Phase 2 were modified both prior to the original launch, and then again prior to the launch of the Group 2b domain names in March 2002.
Phase 3	Phase 3 is commonly referred to as the “Go-Live” period (beginning November 7, 2001) when the Registry began accepting “live” domain registrations from Registrants through Registrars.

DNA Grouping

- Group 1a:** Domain Name Applications (DNAs) for a single domain name that did not have a corresponding IP Claim.
- Group 1b:** Domain Name Applications (DNAs) for a single domain name that had one or more corresponding IP Claims.
- Group 2a:** Multiple Domain Name Applications (DNAs) for a single domain name from a single applicant.
- Group 2b:** Multiple Domain Name Applications (DNAs) for a single domain name from more than one applicant. (Group 2b consisted of the applications for domains that were the subject of the class-action litigation described in more detail below.)

Dispute Resolution Policies

- UDRP** The Uniform Domain-Name Dispute Resolution Policy (UDRP) has been adopted by ICANN-accredited registrars in all gTLDs (.aero, .biz, .com, .coop, .info, .museum, .name, .net, .org, .pro). Dispute proceedings arising from alleged abusive registrations of domain names (for example, cybersquatting) may be initiated by a holder of trademark rights. The UDRP is a policy between a registrar and its customer and is included in registration agreements for all ICANN-accredited registrars.
- STOP:** Start-up Trademark Opposition Policy (referred to as the Start-up Uniform Dispute Resolution Policy, or SUDRP, in the .biz Agreement). All disputes between an IP Claimant and a domain name Registrant regarding the registration of a .biz name are decided under the *Start-Up Trademark Opposition Policy (STOP)*, a unique dispute resolution solution that is similar to the UDRP and RDRP, but with a lower burden of proof for intellectual property owners. STOP was available only to intellectual property owners who enrolled in NeuLevel's IP Claim Service. STOP allowed a Claimant to prevail where he or she demonstrates that a domain name was either registered in bad faith or used in bad faith.

3. Executive Summary

The 2001 launch of .biz introduced an exciting new opportunity for businesses around the world to develop their online presence and differentiate their branding with a domain name dedicated specifically to commercial enterprise and activity.

A milestone in the history of the Internet occurred on June 27, 2001 when the .biz gTLD was first added to the Internet's authoritative root server. This marked the launch of a new, commercially focused gTLD that would be open to the global Internet community. Immediately following insertion of .biz into the A-Root, worldwide access to the new .biz namespace was made available, and Internet users were able to access this new domain at www.neulevel.biz.

In the subsequent months, a phased rollout of the new TLD ensued. After just one year of operation, the .biz TLD had proven to be a successful and stable addition to the Internet. After 12 months of registration activity, over 800,000 .biz domains had been registered, and NeuLevel processed the one-millionth .biz domain registration in August 2003. The systems architecture developed by NeuLevel has proven to be stable, secure, reliable, sufficiently robust to easily handle the loads currently seen in .biz as well as our other domain name registries, and highly scalable.

Four Goals for a Successful Launch

The introduction of the .biz gTLD was implemented through a deliberate and phased approach designed to meet the following important goals:

- Maintain the stability of the DNS and the authoritative root
- Protect intellectual property rights
- Provide equal access to Registry services in an even-handed manner to all Registrars
- Provide a robust, enterprise-level registration system for the efficient processing of large volumes of transactions, which in turn would enable Registrars to provide their Registrants swift and fair access to all new unreserved names

The four goals listed above were considered during the design and launch of .biz, and each was evaluated throughout the course of bringing the new TLD into operation. Although there was a clearly defined process for implementing the TLD set forth in Appendix J to the .biz Registry Agreement (found at <http://www.icann.org/tlds/agreements/biz/registry-agmt-appj-11may01.htm>), the Registry was responsive to dynamic circumstances, needs and events including the legitimate comments and concerns of the Registrar community, unforeseen legal challenges, and the terrorist attacks of September 11, 2001. With the cooperation and approval of ICANN staff, NeuLevel was able to quickly and effectively modify the original plan, both in structure and in timing, to continually balance and meet each of the four primary objectives.

Overview of Pre-Launch Phases

In consultation with ICANN staff, NeuLevel's launch process was designed to address the legitimate concerns of the Intellectual Property (IP) community by affording them the same rights as they have in the physical world, while still guaranteeing the right to equal access for both Registrars and Registrants. The resulting process accomplished these two important and competing goals, but

in doing so created the greatest challenges faced by NeuLevel, Registrars and Registrants during the launch of the .biz TLD.

With its multiple phases, timelines, differences in technological approach, and short lead times for implementation by Registrars, the IP Claims and DNA submission/randomization processes were complex; challenging to explain to Registrars, the intellectual property community and the general Internet population; and rolled out with limited time for implementation. In spite of these challenges, the IP Claims process and STOP procedures did help protect the rights of intellectual property holders, and the RDNA randomization ensured equal opportunity to all potential Registrants during the landrush phase. The interaction of these two processes did work effectively, albeit with certain implementation challenges.

Ultimately, the single greatest negative impact on the launch of the .biz TLD was the filing of two class-action lawsuits (Smiley vs. ICANN, et al. and ePrize vs. NeuLevel, Inc.), later combined into one lawsuit, which alleged that the assignment of .biz landrush domains amounted to an "illegal lottery." More information can be found later in this report.

The complexity inherent in the IP Claims and DNA processes, combined with the uncertainty brought on by the lawsuit, created confusion and a sense that greater problems might exist with the overall launch. This was due in large measure to the "newness" of the process of launching a TLD with over 80 Registrars, the oversensitivity to the protection of intellectual property rights, and that the .biz launch process was the first of its kind. While there was complexity and confusion during Phases 1 and 2, there were few technical problems during Phase 3 live registrations.

Overview of Registry Go-Live

Despite the Phase 1 and Phase 2 challenges (outlined above and detailed in the sections to follow), the actual launch of .biz was a technical and operational success. The EPP-based hardware and software Registry systems developed by NeuLevel performed flawlessly at launch. By inviting Registrars to "pre-load" contact data and implementing technical solutions (including network traffic management devices, load balancers, a Web server farm and application server farm) designed specifically to manage extreme loads, NeuLevel was able to ensure a smooth launch with equal access to all .biz-accredited Registrars that chose to participate. On the launch date of November 7, 2001, NeuLevel accepted 59,962 live .biz domain registrations from 86 Registrars and had no outages or other technical problems. During the first week of live registrations, NeuLevel successfully processed 139,877 live .biz domains, showing that not only were our systems able to handle an initial load, but that they would also remain in operation with no requirement for emergency maintenance after go-live.

4. Launch Timeline

Date	Event
11/16/2000	NeuLevel selected by ICANN to administer .biz Registry
5/11/2001	NeuLevel signs final .biz registry agreement with ICANN (close to six months after selection)
5/21/2001	Acceptance of IP Claims begins
5/25/2001	Acceptance of Domain Name Applications (DNAs) begins
6/26/2001	Department of Commerce (DOC) approves loading of .biz into the authoritative root server
7/23/2001	Smiley litigation filed
8/8/2001	IP Claims due (80,008 IP Claims received)
8/9/2001	DNA Processing begins
9/17/2001	Original due date for DNAs
9/25/2001	Extended due date for DNAs (due to September 11, 2001 attacks); DNA matched up against IP Claim database; notifications sent to all DNA applicants with applications that match one or more IP Claims, 1,278,498 applications with an IP Claim match received
10/1/2001	Scheduled date to go live for all domain names Went live with Group 1A (167,816 Names)
10/8/2001	Extended Date to respond to IP Claim notification (for groups 2A and 2B) Approximately 198,000 domain applications cancelled
10/11/2001	Injunction granted against going live with groups 2A and 2B
10/25/2001	Injunction lifted for Plaintiffs' failure to post \$1.6 million bond
11/7/2001	Registry officially goes live with "first-come, first-served" names All Group 2A and 2B Names placed on hold
11/19/2001	Registry goes live with Groups 1B (25,470 names) and 2A (46,500 names) Approximately 25,000 domain names in STOP (Groups 2A and 1B)
12/15/2001	Announcement of new process for release of 2B names and refund
Feb 02	Collection of new Group 2B Domain Name Applications begins
Mar 02	Last day to submit domain name applications and begin sending out IP Claim Notices
4/8/2002	Went live with Group 2B Names (128,015 apps for 39,655 2B names) Names with IP Claims entered into STOP
4/8/2002	Announcement of the investigation of more than 11,000 registrations for which there were a number of registrations in the name of one person
4/11/2002	Specific Registrars receive notifications regarding successful registrations

5. Process Overview

NeuLevel followed a multi-phased start-up procedure for .biz. These phases were designed to ensure fairness and equity to all ICANN-Accredited Registrars, resellers, potential Registrants and actual Registrants to reflect the diverse needs of these constituencies, and to provide protection of intellectual property rights.

Because each of the new gTLDs launched in 2001 used a slightly different “pre-launch” process, we have included an overview of the .biz pre-launch phases, including descriptions of each phase and the actual dates for each milestone. The following provides a framework and timeline of the launch based on actual start-up events, and provides definition of specific events, services and activities for the data presented in the tables below. The process is discussed with respect to the three phases of start-up as follows:

- IP Claims (May 21-August 8, 2001)
- Domain Name Application and Randomization (May 25-September 25, 2001)
- Registry Live (November 7, 2001)

Phase 1: IP Claims (May 21—August 8, 2001)

As there is no worldwide database of trademarks and service marks that can be relied upon to determine the legitimate intellectual property claims of potential Registrants in advance of live registrations, NeuLevel developed the Intellectual Property Claim Service (IP Claim). The Intellectual Property Claim Service, also referred to as “Trademark Claim Form” in the .biz Registry Agreement, was designed to help companies protect their trademarks and service marks during the launch of the .biz TLD by enabling these companies to stake claims to domain names prior to the commencement of service and live .biz domain registrations. Submitting an IP Claim enabled claimants to take advantage of the Start-up Trademark Opposition Policy (STOP), the system developed by NeuLevel to help in the protection of intellectual property rights. The key factor of timing enabled Claimants to challenge eventual Registrants before the domains could be used.

NeuLevel accepted IP Claims from May 21, 2001 until August 8, 2001. During this time, 80,008 IP Claims were collected from entities around the world. Recognizing that multiple intellectual property owners could have trademark rights in a particular mark, multiple IP Claims for the same string were accepted. This provided any potential intellectual property holder with an equal opportunity to stake their claim to a certain string. All applications were logged into an IP Claims database managed by NeuLevel. The IP Claimant was required to provide various information about their IP rights, including (i) the particular trademark or service mark relied on for the IP Claim; (ii) the date a trademark application on the mark was filed, if any, on the string of the domain name; (iii) the country where the mark was filed, if applicable; (iv) the registration date, if applicable; (v) the class or classes of goods and services for which the trademark or service mark was registered; and (vi) the name of a contact person with whom to discuss intellectual property rights.

Once all IP Claims and Domain Name Applications were collected, NeuLevel then compared the IP Claims contained within the IP Claims database with the database of Domain Name Applications (DNAs) collected during Phase 2 (both during the DNA and RDNA processes). In the event of a

match between an IP Claim and a Phase 2 DNA, an email message was sent to the DNA applicant notifying the applicant of the existing IP Claim. (More detail is provided below under *Phase 2 – Domain Name Applications and Randomization*.)

NeuLevel originally intended to offer the IP Claim service solely and directly to the end users (in this case, intellectual property holders). The original plan would have enabled NeuLevel to ensure that accurate and consistent data was submitted during the collection process, but would have limited the participation of Registrars in this initial phase of the .biz launch. After receiving feedback from the Registrar community and ICANN, it was determined that Registrars also should be able to offer the IP Claims service directly to their customers. This had both positive and negative consequences, but overall, was a positive development. As a result of the Registrars' efforts, there was more of an awareness in the intellectual property community that this service was being offered. Similarly, it enabled registrars to ease the burden on NeuLevel of first-level customer support. However, on more than one occasion, NeuLevel was contacted by IP Claimants' whose IP Claims were either never submitted to NeuLevel or whose claims were filed incorrectly (with either the wrong contact person included or incorrect trademark information) by the Registrars. This caused problems later on during Phase 3 during the STOP process (described below).

Ultimately, there were three (3) options available to an IP Claimant wishing to submit a claim:

- Claimants could go directly to the NeuLevel website, submit an IP Claim form and pay a fee of \$90.00. (This option provided a one-dollar revenue share to the Registrar selected by the IP Claimant from a "drop-down menu" on the NeuLevel website.)
- Registrars could forward IP Claimants to a Registrar-branded "white site" managed and maintained by NeuLevel. The white site made it appear to the IP Claimant that it was ordering the IP Claim directly from the Registrar, when in reality the Claimant was purchasing the IP Claim through NeuLevel's system. The IP Claimant would pay NeuLevel \$90.00, and the Registrar would get a small revenue-share payment from NeuLevel.
- Finally, Registrars could collect all of the data required to file an IP Claim directly from their customers, and then submit that data in a batch file to NeuLevel. Registrars would charge their customers directly, and then pay the IP Claim fee to NeuLevel.

There was no restriction on the number of intellectual property owners that could file IP Claim forms for a given domain name. Further, Trademark owners were not permitted to submit a Trademark Claim Form after the Claim Period.

Throughout this process, NeuLevel DID NOT:

- Verify whether a claim corresponds with an actual Trademark
- Provide legal oversight or adjudication
- Guarantee or represent that a Trademark owner who enrolls in the IP Claim Service will receive the actual domain name

Important Note: Submission of an IP Claim did not create any special rights with respect to registering a particular domain name. Any Claimant who wished to register a domain name also had to submit a separate domain name application (DNA) as described below in order to be eligible to have a chance at receiving the actual domain name. In hindsight, not having a DNA "bundled" with an IP Claim created some confusion among potential Registrants, and if required to introduce another generic TLD using the IP Claim service,

NeuLevel would redesign the system to require the inclusion of at least one DNA with every IP Claim purchased.

Phase 2: Domain Name Application and Randomization (May 25—September 25, 2001)

Concurrent with the collection of IP Claims, NeuLevel also began accepting Domain Name Applications (DNAs) on May 25, 2001. As part of Phase 2, DNAs were submitted to NeuLevel by potential “landrush” Registrants through their Registrars of choice. The DNAs included all the information that would be submitted during a live domain registration to ensure accurate WHOIS records after the proposed randomization. DNAs enabled the equitable assignment of domain names during randomization, protected intellectual property rights in conjunction with IP Claims, and helped NeuLevel to manage the pent-up “landrush” demand expected with the introduction of a new TLD. NeuLevel processed landrush registrations by collecting DNA batches from Registrars, rather than opting for an initial influx of “first-come, first-served” live registrations. The Registry fee was \$2.00 per DNA. DNAs were accepted through September 25, 2001, on which date the random processing/landrush procedures commenced.

The DNA phase was open to all accredited Registrars wishing to participate. Registrars submitted batch files to NeuLevel, which were uploaded to an SCP server. (SSH was the chosen mechanism for batch submission because of its level of security and encryption.) Each Registrar had his or her own individual account on the SCP server, and each account on the SCP server had the following directories:

- Incoming (for submission of batch files)
- Errors (for retrieval of failed batch files)
- Reports (for daily reports detailing each submitted application)

Each .biz DNA submitted via batch file transfer was processed and checked for accuracy. If an application *failed* an edit, the entire batch file was returned to the Registrar along with the reasons why it failed. If an application *passed* an edit, the domain name requested was checked against the claims database.

Prior to the proposed Phase 2 randomization, each DNA received by NeuLevel was compared to the IP Claim database. If there was a preexisting IP Claim, the DNA was marked and an email sent to the applicant informing him/her of the preexisting IP Claim on the string. The email also stressed that if the applicant chose to continue the application process and was ultimately selected as the Registrant after randomization, he/she would be required to undergo the Start-up Trademark Opposition Policy (STOP) if challenged by the IP Claimant for that particular domain name.



DNA Notification - Proceed or Cancel

In addition to all of the IP Claim information, the email notification to the Applicant provided a link to a secure site where the Applicant was instructed to confirm whether he/she wished to proceed with the domain name application in light of the existing IP Claim. The Applicant then had the option to proceed with the application or cancel. Proceeding on an application meant that the applicant wanted to go forward and have the application included in the randomization process despite having been notified of an existing IP Claim. By choosing to “cancel,” the applicant made a

decision in light of an existing IP Claim notification to not proceed with including their application for randomization.

If the Applicant did not respond to the email notification from NeuLevel, or elected to cancel the Application, the DNA was not processed during randomization, thus making the Applicant ineligible to register the actual domain name. If the Applicant affirmatively elected to continue the application process after being notified of the Claimant's (or Claimants') alleged trademark rights to the desired domain name, NeuLevel provided confirmation to the Applicant as well as the participating Registrar through which the Applicant filed the DNA confirming the decision to pursue the domain name during randomization.

There were five (5) possible categories into which a DNA could fall, dependent upon whether there was a match, or if the applicant chose to proceed, cancel, or did not reply. Those categories are as follows:

Status	Definition	Quantity
Clean	DNA with no IP Claim match and eligible for domain name selection	862,058
Dirty	DNA with an IP Claim match - required proceed/cancel notification	167,811
Cancel	DNA that Applicant chose to proactively cancel after notification	26,700
Deactivated	DNA voluntarily removed by Applicant	138
Dead	DNA with match where Applicant did not "proceed" or "cancel"	66,404
Match	DNA that Applicant chose to proactively "proceed"	1,278,498
		Total 2,401,609

NeuLevel received a total of 2,401,609 Domain Name Applications. Not all applications were for unique names, and some applicants filed more than one application per domain. No applications were accepted for names on the reserved name list (Appendix X in Registry Agreement). The applications were collectively grouped into four categories (listed below) that ultimately determined at what point domain names went live in the .biz Registry. Any domains with a corresponding IP Claim were subsequently placed into the STOP process.

After the processing of all DNAs, each participating Registrar was notified of the domain names granted for that Registrar's customers. It was then the responsibility of each Registrar to notify its customers whether they received the name(s) for which they submitted DNAs. Participating Registrars were responsible for payment for each domain name that was successfully registered; domain names registered following the randomization process were registered for two (2) years.

Concurrent with Phase 2, the Registry continued Registrar accreditation and began operational testing and integration. Registrar toolkits were distributed to help each Registrar participate in the varying services offered by the Registry. Additionally, XRP and other Registry systems development continued, as well as the acquisition of Registry hardware. The first four (4) name server delegations (in Sterling, VA; Chicago, IL; San Jose, CA; and London, U.K.) occurred in the latter part of the phase.

Phase 2 Challenges and Issues

- **In designing the Phase 2 DNA submission process, Registrars were not provided an incentive to submit their DNA batch files early and often.** This encouraged most Registrars to wait until the last minute to submit their files, which in turn limited the opportunity for Registrars to determine if their files were formatted properly and to take corrective action before the deadline.
- The DNA submission data requirements were extensive and the edits were tight. This caused the files submitted from Registrars during the DNA to be error-prone, which in turn delayed file processing. **Registrars were forced to scramble at the last minute to edit and re-submit files with proper formatting.**
- **The XML schema for DNA did not match one-for-one the EPP schema required for live registrations.** This caused some difficulty in loading the SRS from the DNA files.
- **The “proceed-cancel” process for DNA that had an IP Claim match was confusing to some applicants and IP Claimants.** For each DNA that had a corresponding IP Claim, NeuLevel sent an email to the applicant with a one-time use password. The Registrant then had to go to a NeuLevel-managed website and select either “proceed” or “cancel” on each DNA they submitted. The one-time use password became a significant operational challenge, but was also an example of the importance placed upon security by NeuLevel during the launch of .biz. In addition, there were many registrars that included their own information in place of the information needed by the true applicant. In those circumstances, rather than the true applicant being notified about the IP Claim, the Registrar was notified about the claim. It was later discovered that a couple of registrars’ failed to notify several of their customers. This created a number of support issues for the registry.
- **The volume of emails NeuLevel sent out caused problems with internal email servers, as well as with ISPs that mistakenly thought we were spamming.**

DNA Randomization (Proposed Plan)

NeuLevel had intended to institute a multiple-randomization process for processing the DNA for domain selection. All of the DNAs from participating Registrars received by NeuLevel were to be combined and randomized into a single batch for processing. This process would have ensured fairness for each Registrar and Applicant. In order to reassure the Registrar community and the public that the results were truly random, NeuLevel applied a randomization algorithm to the batch. The requirement of the randomization algorithm was to ensure that submitted domain names are completely randomized, without bias to any Registrar or Registrant.

Smiley Litigation

During the DNA process, on June 23, 2001, David Smiley and Skyscraper Productions filed a class-action suit against ICANN, NeuLevel and numerous Registrars on behalf of all .biz domain name applicants, regarding the launch of .biz. Among other things, the complaint targeted the rollout system for .biz, which the Plaintiffs claimed constituted an illegal “lottery enterprise.” To advance their case, the Plaintiffs filed a motion for a Preliminary Injunction to prevent NeuLevel from randomizing the applications received during the domain name application process.

The Preliminary Injunction motion applied only to domain names for which there were multiple applications that were to go through the randomization process described above. As a result, NeuLevel created the following classifications for the DNAs that were submitted during Phase 2.

- Group 1a:** DNAs for a single domain name that did not have a corresponding IP Claim. This group represented 167,816 domains that went “live” on October 1, 2001.
- Group 1b:** DNAs for a single domain name that had a single, corresponding IP Claim. This group represented 25,470 domains that went “live” on November 19, 2001.
- Group 2a:** DNAs for a single domain name from a single applicant. This group represented 46,462 domains that went “live” on November 19, 2001.
- Group 2b:** DNAs for a single domain name from multiple applicants. This represented 128,015 applications for 39,655 domains that went live on April 8, 2003.

Although the lawsuit applied to DNAs in all of the above groups, upon closer analysis of the particular domain name applications received by NeuLevel during the DNA stage of the .biz launch, it appeared that more than 80% of the domain names applied for during the .biz DNA process were *unaffected* by the Preliminary Injunction motion because they were for domain names for which only one application was received (Group 1a or 1b), or domain names for which there was more than one application filed by the same one entity (Group 2a). By filing the Motion for Preliminary Injunction, the Plaintiffs sought to prevent the randomization of domain name applications for domain names that had multiple applications filed by more than one applicant (Group 2b).

Despite a vigorous defense by NeuLevel, the Superior Court of Los Angeles, California issued a preliminary injunction on October 11, 2001, preventing the activation of the Group 2B .biz domain names. The injunction, however, dissolved a week or two later, when the Plaintiffs were unable to post the bond issued by the Court.

On November 19, 2001, the Group 1A, 1B and Group 2A DNA went live (as there was no randomization required). Despite the dissolution of the injunction, NeuLevel decided to not randomize Group 2B DNAs (as described above) to select an ultimate registrant and go live with the Group 2B names, which represented fewer than 20% of the domain names applied for during the DNA process. Rather than launch these names, NeuLevel decided (in consultation with ICANN) to return *all* of the Group 2B domain name applications to the Registrars from which they originated, and to refund the required \$2.00 domain name application fee for each application to each Registrar that certified to NeuLevel that it had refunded the \$2.00 to each of its Registrants.

In addition, NeuLevel, in conjunction with the Registrars, formulated a new process (the RDNA process) for the “re-cast,” or re-randomization, of the Group 2B Names in a manner that did not require the \$2.00 fee. NeuLevel began accepting new RDNAs in early 2002 without requiring the fee. It also performed its obligations under the IP Claim Process with respect to these names. After using the randomization process described below, the 39,655 domains selected from the RDNA applications went live on April 8, 2002. There were a total of 597,528 RDNAs.

With the Group 2B domain names launched (requiring no application fee), there was little reason for the Plaintiffs to continue the litigation. Shortly thereafter, the Plaintiffs agreed to a settlement of the litigation in exchange for proportional refunds for each of the Group 2A names as well as paying the attorneys' fees. The litigation, and the administration of the settlement, cost NeuLevel several

million dollars. NeuLevel was disappointed with the Court's decision and the impact it had on some .biz applicants, and NeuLevel strongly believes to this day that the process NeuLevel set forth and developed in conjunction with ICANN was the most fair and equitable way to distribute domain names. This case was highly problematic because it directly impacted and disrupted the planned rollout phases and distribution of domains. Registrars, Resellers and Registrants were all affected by this decision; the entire process was extremely complicated and difficult at both the operational and relationship management levels.

RDNA Randomization Process

During the randomization process of RDNA, all domain name applications fell into one of two categories; each RDNA must either have been “proceeded on” or had no claims against it. Essentially, each RDNA was placed into one “bucket” and randomly selected to choose a Registrant.

The entire process was done on a secure workstation and a locked-down database that was inaccessible by outside parties while Random Selection was in progress. The process used randomization software provided by SAS Inc.; the SAS software provided guaranteed random numbers that were assigned to every eligible DNA. Each DNA was then sorted in ascending order, and names were awarded to the application with the lowest number.

Names that had no claims against them were added and allowed to propagate to DNS, while names that had claims on them were added but not allowed to propagate to DNS. Names with claims against them were also sent to STOP for dispute processing.

The advantages of batch processing and random selection were:

- NeuLevel was able to handle millions of applications and claims
- Trademark holders were able to protect brands and intellectual property in .biz
- Neutral and effective allocation of domain names during the start-up period
- Effective management of technical resource issues
- Non-discriminatory application process for all parties of new domain names
- Scalable and effective support for all volumes of registrations
- Flexible system capable of responding to rapidly changing volumes
- Inexpensive solution implementation
- Affordable to all members of the Internet community

Conversely, NeuLevel also recognized a small number of imperfections in the process. The IP Claims process did not check for valid trademarks, a number of .biz applicants found the “Proceed/Cancel” process confusing, and it was discovered that the randomization routine encouraged multiple applications.

All in all, however, NeuLevel’s batch processing and random selection solution effectively moderated the anticipated volumes of registration requests without having any significant impact on fairness, stability, or system resources. NeuLevel’s solution was fully scalable, ensuring stability even when registration volumes greatly exceeded predictions.

Recommendations for Future Randomizations

Over the course of three (3) randomization runs, NeuLevel has, by turns, deployed the following:

- **Single randomization.** This logic puts all applications into one “bucket” and subjects them all to random selection. This encourages Registrants to “game the system” through the submission of multiple applications.
- **Round-robin.** This logic randomly orders applications within each Registrar queue, then randomly selects applications one at a time from each Registrar. This method tends to benefit Registrars that submit smaller lists.
- **Double randomization.** This logic randomly selects applications from within a Registrar queue. Once unique applications exist in each Registrar queue, all applications are put into one “bucket” and selected at random (much like the first method listed above). This system, also, can be gamed if Registrants submit multiple applications and use multiple Registrars.

As each of these methods has its own subtle flaws, NeuLevel is now a proponent of *triple randomization* when randomization is to be used during a launch. As stated elsewhere in this report, NeuLevel would seriously consider implementing a “first-come, first-served” approach for launching a new TLD, but if a landrush system is to be introduced, we would propose triple randomization. Under this new system, NeuLevel would first randomly select within the Registrar queue to solve the problem of Registrar gaming and eliminate multiple applications. Second, applications would be randomly selected based on Registrant queues (using primary emails). This, too, addresses the problem of applicants gaming the system through multiple applications. Finally, a random selection of remaining applications would be done from one bucket, thus removing the advantages of submitting smaller lists.

Phase 3: Registry Live (November 7, 2001)

Concurrent with the rollout of Phase 1 (IP Claims) and Phase 2 (DNA), NeuLevel was developing the final systems for the official commencement of service and continued to contact potential Registrars to accredit them to offer .biz domain names. At the time .biz was officially entered into the root, three (3) domain names were added (neulevel.biz, newlevel.biz, and nic.biz) to assist in the promotion and development of the .biz TLD.

Domain Names first became available in the .biz Registry in the fall of 2001, when the domain names from Group 1a began resolving on October 1, 2001. All names with an IP Claim were placed on a 30-day hold when launched, and any domain name with one or more IP Claims went through the STOP. The Group 1b names were placed in the database just prior to the launch of the live registration system on November 7, 2001. The Group 2a names went through a randomization process, and the resulting registrations also went into the database prior to the go-live launch. The .biz Registry began accepting live registrations from .biz-accredited Registrars through the XRP interface on November 7, 2001.

The Group 2b names (those with multiple DNAs from multiple entities) were placed on hold pending resolution of the Smiley litigation and while a revised process was designed. Eventually, the \$2.00 DNA fee was refunded to the applicants (through the registrars), and all DNAs returned to those with domains in Group 2b. A new “round robin” processing model, free to prospective Registrants, was devised for collecting these requested names. This “round robin” process occurred in April 2002, and 128,015 names were registered in the database on April 8, 2002.

“Registry Live” began on November 7, 2001. Before being granted access to the Registry Live system, ICANN-Accredited Registrars were required to pass a more extensive acceptance test than for Phases 1 and 2 described above. It required that Registrars seeking .biz accreditation pass an XRP acceptance test, which involved:

- Connecting to the Registry and establishing a session
- Passing the authentication/authorization process
- Executing a script testing each XRP function at least once
- Disconnecting from the system

NeuLevel recorded a transaction log documenting each Registrar's interaction with the Registry system; once a Registrar successfully passed the test, that Registrar was granted full access to the system.

As of the Registry Live Date, all domain names granted during the landrush phase were activated in the DNS unless such names were subject to the STOP Hold Period described below. The registration of a domain name in the live Registry that was the subject of a complete IP Claims Form was automatically placed on a 30-day Hold Period during which the IP Claimants were advised by email of the identity of the person or entity that had registered the exact Trademark claimed. The notification email also included the full WHOIS information of the Registrant and a hyperlink to the Start-Up Trademark Opposition Policy (STOP). During this Hold Period, the domain name was not activated in the DNS and, as a result, did not resolve. Like the current UDRP process, if an IP Claimant filed a STOP Complaint against the registration in the formal STOP process, the domain name was "locked" until the dispute was decided. During such a “locked” period, modification by the Registrant of the domain name information (i.e. holder, contact information, etc.) was not permitted. However, the domain name did resolve to the DNS after the Hold Period.

Start-up Trademark Opposition Policy (STOP)

All disputes between IP Claimants and .biz Registrants regarding the registration of a .biz name were decided under the *Start-Up Trademark Opposition Policy (STOP)*, a unique dispute resolution solution that incorporates many elements of the Uniform Dispute Resolution Policy (UDRP).

Formerly called the Start-Up Dispute Resolution Policy (SUDRP), STOP was one of three (3) dispute resolution policies adopted by NeuLevel in coordination with ICANN to be used in trademark-based domain name disputes. The Uniform Domain Name Dispute Resolution Policy (UDRP) and the Restrictions Dispute Resolution Policy (RDRP) are the other two policies. STOP was available only to intellectual property owners enrolled in NeuLevel’s Intellectual Property Claim Service.

The following paragraphs are taken from the *WIPO End Report on Case Administration* under the Start-Up Trademark Opposition Policy for .biz (currently found at <http://arbiter.wipo.int/domains/reports/biz-stop/report/index.html#3>), which accurately reflects certain key aspects of the process for the STOP Policy.

3. The Start-up Trademark Opposition Policy for .biz

Apart from being connected to the IP Claim system, the procedure and the substantive requirements under STOP also differed from the UDRP in the following important respects:

- Under STOP, the Complainant had to show that the disputed domain name(s) was (were) identical - not merely confusingly similar - to its trademark or service mark, STOP, paragraph 4(a)(I);*
- Under STOP, it was sufficient to prove either registration or - not "and" - use in bad faith, STOP, paragraph 4(a)(iii);*
- The only available remedy under STOP was transfer and not also cancellation, STOP, paragraph 4(I).*
- Parties could not opt for three-member Panels; STOP disputes were exclusively decided by single-member Panels, STOP, paragraph 4(e).*

(See [Annex 1 STOP Policy and Rules.](#))

As noted, STOP complaints could only be filed by IP Claimants that had been notified by NeuLevel of their priority status. In order to ensure that STOP complaints were only initiated by priority IP Claimants, dispute resolution service providers were required to verify the standing of STOP Complainants. This was effected on the basis of "ticket numbers," i.e., a code, which NeuLevel assigned to priority Claimants and which had to be provided in the complaint. Thus, each time a complaint was received, dispute resolution service providers had to verify the ticket number. Complaints without a valid ticket number were not accepted.

Pursuant to its paragraph 5, STOP took precedence over the UDRP so that, as long as a .biz domain name was, or could be, subject to a STOP proceeding, no UDRP complaint could be filed by others against that domain name. When receiving UDRP complaints relating to .biz domain names, dispute resolution providers were therefore required to verify whether the domain name in question was subject to an IP Claim, in which case they could not accept any UDRP complaint.

4. Multiple IP Claims and STOP

Several other differences between STOP and the UDRP resulted from the fact that NeuLevel did not restrict the number of IP Claims that could be filed for a given alphanumeric string, and that non-priority Claimants might be invited to initiate STOP complaints if the prior proceeding was terminated or unsuccessful.

Whenever a disputed domain name was subject to multiple IP Claims, the Panelist deciding the case was required to determine whether subsequent IP Claimants could initiate STOP proceedings. This determination was to be made on the basis of the following criteria, which are listed in STOP, paragraph 4(l)(ii) and STOP Rules, paragraph 15(e):

- If the Complainant prevailed, no further challenges under STOP were permitted against the disputed domain name;*

- If the Complainant did not prevail, and the Respondent could demonstrate a right or a legitimate interest in the disputed domain name, no further challenges under STOP were permitted against that domain name;

- If the Complainant did not prevail (because it did not own an identical trademark, or failed to prove bad faith), but the Respondent could not demonstrate a right or legitimate interest in the disputed domain name, the Panel permitted subsequent challenges to that domain name. In that case, NeuLevel, after being notified by the dispute resolution provider, notified the next Claimant in the priority order of its right to file a STOP complaint within 20 days.

In order to safeguard the potential right of subsequent IP Claimants to initiate a STOP proceeding, NeuLevel decided not to give effect to any transfers based on settlement between a STOP Complainant and a Respondent if the domain name in question was subject to multiple IP Claims (STOP, paragraph 8 and STOP Rules, paragraph 17(a)).

5. NeuLevel STOP Database

In order to align the administration of STOP complaints with the IP Claim system, providers were required, at various times during the administration of a STOP complaint, to interact with NeuLevel's proprietary STOP database. Providers were first required to verify the standing of STOP Complainants on the basis of NeuLevel ticket numbers to be provided in the complaint. In addition, providers updated the database each time a STOP proceeding was initiated, suspended, terminated or decided. On the basis of these updates, NeuLevel notified any non-priority Claimants of the development of the proceeding concerned, i.e. the fact that a complaint had been filed, that the proceeding had been terminated (for an uncured deficiency) or that a decision had been rendered, and whether that decision allowed further challenges to the disputed domain name or not.

STOP was not intended to replace any national law or other Resolution Policies such as UDRP or RDRP. However, no UDRP or RDRP case can be initiated on a given domain name until STOP has been completed for that Domain Name. For the launch of the .biz TLD, the STOP process takes precedence. Although the process is very similar to the UDRP, STOP carries a lower burden of proof. Unlike the UDRP where a Claimant must demonstrate that a domain name Registrant both registered a domain name in bad faith and used the domain name in bad faith, STOP allows a Claimant to prevail where he or she demonstrates that a domain name was either registered in bad faith or used in bad faith.

Because many of the disputes under the STOP were brought by complainants prior to actual use of the domain name by the domain name Registrant, the STOP, unlike the UDRP, only required that the complainant prove that the domain name had been registered in bad faith or was being used in bad faith. Under the UDRP (as adopted by ICANN), a complainant must prove that the domain name was both registered in bad faith and used in bad faith. This not only made it easier for valid trademark owners to enforce their intellectual property rights, but also significantly limited cybersquatting.

The following is a breakdown of STOP cases to date (5/15/04) 

Number of Potential Cases	62346
Released IP Claims	10500
Registered Cases	0
Expired Cases	49385
Expired-Grace Cases	1396
Pending Cases	4
Pending > 10 Days	4
Pending > 30 Days	4
Suspended Cases	0
Suspended > 30 Days	0
Suspended > 60 Days	0
Withdrawn Cases	205
Complaint Decided Next	96
Decided for Respondent	206
Decided for Complainant	303

NeuLevel was satisfied with the overall effectiveness of the STOP because the system gave genuine trademark holders a chance to challenge domain name Registrants who were in apparent violation of trademark holders' Intellectual Property rights prior to the name going live.

As noted above, in cases where there were multiple IP claimants, the STOP prioritized the filing order, thereby streamlining the case initiation process. The STOP allowed parties to simultaneously file cases against multiple domains under the same dispute provider ticket number. (For example, if a party had filed IP claims for multiple names, and received the same priority ranking for several of those names, it would have had the opportunity to pick up ticket numbers from the STOP at the same time, and to proceed to file cases against the multiple domains that the tickets allowed.)

The STOP sped up the filing process by limiting the case initiation process to a 20-day window, and by limiting the dispute resolution provider's window for updating the Case Management System to 10 days from the closing of the aforementioned 20-day window. This greatly reduced unnecessary delays in the filing and review of documents.

In a majority of cases, the 20-day window was sufficient for the complainant to collect data and initiate a case. Therefore, the system did not appear to speed things up at the expense of any of the parties involved.

The system effectively weeded out "IP" claimants who had falsely filed IP claims in the hopes of getting the names without contest. Thus, only those with genuine trademarks or established proof of use proceeded to initiate cases. This accounts for the (533 NAF) and (13 WIPO) terminations for failure to provide enough evidence to make a case.

Judging from the large number of Respondents who failed to defend their registrations, it can be assumed that several "Registrants" were deterred and therefore relinquished their domains upon realizing that a system had been put in place to protect the rights of Trademark holders and other parties genuinely interested in registering .biz domains for business (151 NAF and 199 WIPO).

The primary Registrar complaints received by NeuLevel were that the initial STOP files did not explain the filing steps clearly enough. This was corrected in a subsequent system upgrade. The most common complaint received from IP Claimants was that they did not get timely notification due to changed or incorrect contact information. In addition, as noted above, in many cases where the registrar substituted its own information as the contact information for the IP Claimant, notification was often slowed down or never in fact occurred.

The most significant technical difficulty NeuLevel encountered in connection with the SUDRP was complication due to the significant number of email messages required to notify applicants of an IP Claims match and to explain their options. Over 5 million email messages were sent during the various stages of the notification process, which caused many Internet Service Providers (ISPs) to mistakenly classify the emails as "spam." This, in turn, required that NeuLevel resend numerous emails, and request that Registrars forward these important notification emails to their Registrants. One apparent flaw in the process resulted from situations where emails failed to reach the appropriate representatives of the IP claimants, mostly because contact details had changed during the delay in the domain name selection process caused by the litigation in California. This flaw could have been avoided if IP claimant accounts had remained open during the delay for modification of contact addresses where necessary.

6. Assorted Other Legal Challenges

NeuLevel's .biz launch was significantly impacted by a number of lawsuits, most seriously the *Smiley vs. ICANN, et al.* litigation (described earlier) that alleged that the Phase 2 randomization amounted to an "illegal lottery." In addition to that well-known lawsuit, there were other less visible suits (described below) that impacted NeuLevel both during and after the launch process; although NeuLevel prevailed in most of the cases, these suits were conducted at considerable expense. *The possibility of litigation during the process of launching and operating a new TLD and the resulting expense should not be underestimated.*

It is not NeuLevel's intent to delve too deeply into the "legalese" of these cases here; we merely seek to highlight examples of the risk of litigation a Registry operator may face.

SPRL Max & Zoé vs. NeuStar, Inc. (droit.biz)

SPRL Max & Zoé, a Belgian company, initiated legal action against NeuLevel, Inc. and Spacetel Communications under the Belgian Law on Fair Trade Practices for trademark infringement arising from Spacetel's registration of the droit.biz domain name. Max & Zoé claimed to own all rights in and to the word "droit" (French for "law"). Although in the United States, it was widely agreed that a Registry operator is not liable for the trademark infringement of its registrants, this was a case of "first impression" in Belgium, as this issue had never previously been raised in that country. NeuLevel ultimately prevailed and the lawsuit was eventually dismissed with prejudice. Despite the positive outcome for NeuLevel, the case cost over \$100,000 to defend.

Gregory Crane vs. NeuLevel, Inc. (yellowpages.biz, etc.)

In the summer of 2001, prior to the launch of the .biz domain name registry, Gregory Crane, a resident of the state of Arizona, initiated legal action against NeuLevel, Inc. under Arizona state law and federal law claiming trademark infringement seeking to prevent NeuLevel from allowing any third party from registering a number of generic .biz domain names, including *music.biz*, *sex.biz* and *yellowpages.biz*. Mr. Crane based his claims on state trademark registrations for "music," "sex," and "Yellow Pages." In Arizona, one can obtain a trademark for any word based on simply filing a request. Unlike federal trademarks awarded by the United States Patent and Trademark Office, there is no review of the application, and all applications are granted regardless of whether the marks are generic or whether there are conflicting registrations. In actuality, Mr. Crane had no intellectual property rights in the marks which he was claiming, and had never actually used the marks. It also was learned through discovery that Mr. Crane had obtained these state registrations solely to attempt to get prior rights of these marks as domain names in the .biz and .info domain name spaces. Furthermore, NeuLevel learned that Mr. Crane had been under investigation by the Federal Trade Commission (FTC) for unrelated offenses related to unauthorized scams in other lines of business. NeuLevel ultimately convinced Mr. Crane to dismiss this case with prejudice in early 2002. Despite the frivolous nature of the lawsuit along with the positive result, NeuLevel spent well over \$100,000 in its defense.

Amazon.com, Inc. vs. NeuLevel, Inc. (amazon.biz)

On June 30, 2001, NeuLevel received a letter from Amazon.com threatening to sue NeuLevel based on several theories, including trademark infringement and violation of state unfair competition laws, specifically including the California statute providing for private attorney general enforcement by the defendant of the state lottery law, for violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, and for violation of the Federal Trademark Dilution Act. Amazon.com, through counsel, threatened to initiate litigation against NeuLevel if NeuLevel did not acquiesce to Amazon.com's demand that NeuLevel abandon its .biz Internet domain name registration plan within 10 days and institute a process that would ensure that Amazon.com would be able to register each of its trademarks as .biz domain names. Upon receipt of Amazon.com's demand letter, NeuLevel became greatly concerned about the imminent threat of litigation propounded by Amazon.com and the potential implication of such litigation on the validity of .biz gTLD assignments scheduled to be made to Internet users worldwide just a few months later. Therefore, NeuLevel filed suit in the Eastern District of Virginia seeking a declaratory judgment that the .biz launch process does not violate any of the laws cited in the Amazon.com letter. In November 2001, the lawsuit was dismissed by the Eastern District of Virginia due to lack of "ripeness;" at the time the lawsuit was filed, NeuLevel had not assigned any .biz domain names. Moreover, the court ruled that the letter sent by Amazon.com did not cause an imminent threat of litigation. Despite the negative outcome of the litigation, NeuLevel believes that the litigation succeeded in its secondary purpose of preventing an offensive lawsuit from Amazon.com and discouraging other third parties from sending overly threatening cease and desist letters to the registry.

Marcus Schatte (sex.biz)

On March 27, 2002, the domain name *sex.biz* was registered to a Peter I. Jeong, located in South Korea. Dr. Marcus R. Schatte (the Plaintiff) commenced a private arbitration proceeding with the National Arbitration Foundation (NAF) against the Registrant to resolve a dispute over ownership rights to *sex.biz*. NeuLevel understands that as part of that NAF arbitration, the Plaintiff consented in writing, pursuant to ICANN and NAF dispute resolution policies, to jurisdiction in Seoul, South Korea (where Gabia Inc., the Registrar of *sex.biz*, was located) for any challenge or appeal of the NAF decision. On November 4, 2002, NAF ordered that *sex.biz* be transferred to Schatte, unless the registrant of *sex.biz* filed an appeal with a court of competent jurisdiction within 10 calendar days. NeuLevel was informed that a timely appeal of the NAF decision was filed by the Registrant in a court of law in Seoul, South Korea.

On or about April 11, 2003, while the South Korean action was pending, Schatte filed a complaint in the United States District Court for the Eastern District of Virginia under the *in rem* provisions of the Anti-Cybersquatting Consumer Protection Act ("ACPA"). The Complaint did not reference the pending court action in South Korea appealing the NAF decision. On or about June 4, 2003 NeuLevel provided a Registry Certificate to this Court pursuant to the requirements of the ACPA, and control over *sex.biz* was deposited with this Court.

On September 10, 2003, the court issued a Default Judgment against the *sex.biz* domain name because the Registrant did not make an appearance. The judgment did not reference the prior filed action in South Korea. On or about September 19, 2003, the court in the South Korean action issued a decision that the Registrant was the proper owner. Subsequently, NeuLevel received a letter from the Registrant's United States legal counsel demanding that we not comply with the Eastern

District's default judgment, and requesting that NeuLevel not transfer *sex.biz* to Plaintiff until it had the opportunity to file a motion to vacate or set aside the default judgment and transfer order.

In October 2003, NeuLevel filed a motion seeking relief from the Eastern District in complying with the Court's Default Judgment because by complying with that order, NeuLevel would be in violation of the Korean Court Order. Subsequently, the Registrant filed a motion to set aside the default judgment, which was later granted. Eventually, the case was dismissed through a settlement between the Registrant and Mr. Schatte. The details of the settlement were kept confidential (even from NeuLevel). Although not a dispute directly involving the Registry operator, NeuLevel spent more than \$30,000 towards resolving this dispute.

7. Lessons Learned

Legal

NeuLevel would take greater precaution to identify and avoid any and all specific legal challenges that could cause the launch process to be disrupted. To state the obvious, lawsuits are not always avoidable, and many have little or no merit (e.g., the lawsuits instituted by Crane and the “droit.biz” lawsuit in Belgium. In the case of the *Smiley* litigation, NeuLevel had in fact sought counsel on our proposed launch mechanisms and was comfortable that the process was legally sound. We believed then and continue to believe the Smiley litigation was without merit, but we would take every precaution to avoid a repeat of those unfortunate circumstances. NeuLevel was also involved in numerous other lawsuits filed as a result of the .biz launch, which constituted a drain on resources that could have been better focused on managing the unique demands of launching a new TLD.

Finance

NeuLevel originally allowed Registrars two methods of payment: (1) a “Debit Account” for payment of IP Claim, DNA and domain registration fees; or (2) a corporate credit card. In hindsight, NeuLevel might only require a pre-funded account.

Technical Design & Implementation

With the resounding success of Phase 3 (Registry “Go-Live”) there is little that NeuLevel would change *vis-à-vis* the technical design of the Registry system. The actual go-live launch of .biz was a significant technical and operational success. The EPP-based Registry systems developed by NeuLevel, both hardware and software, performed flawlessly at the time of launch. By inviting Registrars to “pre-load” contact data and implementing technical solutions designed specifically to manage extreme loads, NeuLevel was able to ensure a smooth launch with equal access to all .biz-accredited Registrars. On November 7, 2001, the day of launch, NeuLevel accepted 59,962 live .biz domain registrations from 86 Registrars and had no outages or other technical problems. During the first week of live registrations, NeuLevel successfully processed 139,877 live .biz domains, showing that not only were our systems able to handle an initial load, but were also able to remain in operation with no requirement for emergency maintenance after go-live. If anything, NeuLevel learned from this experience that our technical design and implementation far exceeded the resources required to manage the go-live demand for the .biz TLD.

Further, NeuLevel developed and built its Registry systems and infrastructure based on a level of initial demand for the .biz domain that did not materialize as expected. Based on this experience, in light of the actual demand for a new gTLD and the demonstrated ability of our technical systems to process that demand, NeuLevel would consider launching any future new gTLD on a “first-come, first-served basis.”

Finally, NeuLevel would recommend (for all future versions of the software) a system that accepted all “good” applications in a batch while only rejecting those that were formatted incorrectly. During the .biz launch, NeuLevel rejected entire batch files even if just one application was faulty, and reaccepted batches once the fix was made. This caused confusion and a sense of having to unnecessarily “re-do” work among some Registrars.

Registrar Relations

NeuLevel would greatly simplify the “sunrise” and “landrush” phases, and provide greater lead times to Registrars for implementing any system, particularly if there were other different systems required for a nearly simultaneous launch of another new TLD. We recognize that the domain name industry is, by design, a multi-tiered sales channel, from Registry to Registrar (to Reseller in many cases) to Registrant. As such, whatever process is implemented must be communicated quickly and clearly through each layer. Communicating the details and nuances of such a process through a multi-tiered sales channel is a significant challenge even in the best of circumstances. Additionally, when short timeframes and differences in language, time zones, and other complexities are introduced, confusion is the likely undesired result. A breakdown in communication at any level impacts the quality of service and consumer perception. During the launch of .biz, NeuLevel was committed to timely, high-quality Registrar support. Further, NeuLevel would ensure a more efficient delivery of Registrar Toolkits and allocate additional time and resources for internal support training.

Registrant Relations

NeuLevel is committed to maintaining our position as a neutral third party wholesale provider of Internet services. NeuLevel does not want or expect to have any unnecessary contact with retail consumers of our services. During the launch of .biz, some of the Phases by design required interaction between IP Claimants and the Registry or DNA Applicants and the Registry. This was particularly true with regard to the “proceed/cancel” mechanism built into the DNA landrush phase and with the processing of STOP cases. In retrospect, NeuLevel would design a system where direct interaction with applicants, claimants and Registrants was not necessary. NeuLevel respects the relationship between Registrar and Registrant.

Marketing/Advertising

NeuLevel allocated significant resources to branding and marketing the .biz TLD before, during and after the official launch of the TLD on November 7, 2001. Much of this effort was aimed at developing brand recognition through advertising placement in magazines and publications, sponsorships of events, and other creative means of outreach. In hindsight, NeuLevel would develop a wider array of joint marketing programs with Registrars and bring to bear the retail marketing expertise of our natural sales channel. We would likely provide marketing dollars in a matching arrangement with Registrars, and possibly their Resellers (only with the permission of the Registrar).

8. Conclusion

NeuLevel is proud to have been selected by ICANN as the Registry operator of the .biz gTLD, and we consider the launch of .biz in 2001 to have been a success on many fronts.

Despite the various challenges faced by NeuLevel and the participating Registrars, the .biz TLD was launched successfully, and the Registry systems were able to accept real-time registrations with no technological difficulties or impediments.

In conclusion, NeuLevel has proven to be a neutral, reliable, stable and secure steward of an important resource on the Internet – the .biz gTLD – and we look forward to continuing our responsibilities in this area by working with ICANN and the Registrars to address any future challenges in the namespace.

9. Miscellaneous

Secure Domain Registration Service (a.k.a. BizLock)

NeuLevel proposed a "Secure Domain Name Registration Service" in our original proposal to ICANN for the .biz Registry. Our infrastructure and software were designed and built to support this service and we were prepared to announce the service shortly after the launch of .biz under the service name "BizLock," but determined that there was insufficient demand for such a service provided by the Registry. In fact, after consulting with numerous Registrars, NeuLevel determined that many Registrars viewed BizLock as a competing service and expressed an unwillingness to offer it to their end users. Some Registrars viewed BizLock as unwanted competition for their own domain name lock-down services, some viewed it as an unnecessary suggestion that their systems were not adequately secure, and most Registrars we contacted felt that the gTLD end-user market at that time would not provide sufficient demand to make the service worthy of assigning marketing resources for promotion. Based on this critical feedback, and because NeuLevel was (and continues to be) committed to offering any and all Registry services through ICANN-accredited Registrars only, we chose to not launch the "BizLock" Secure Domain Name Registration Service.

Minimizing Abusive Registration Activity

During the design of .biz launch process, NeuLevel determined that it was very important to minimize abusive domain name registration activity to enable fair and equal access to all potential Registrars and Registrants. In order to accomplish this, NeuLevel incorporated a US\$2.00 fee to the sponsoring Registrar for each Domain Name Application (DNA) submitted to the Registry during Phase 2 of the pre-launch process, with the specific intent of preventing end-users from submitting infinite numbers of DNA for certain domains and in effect "gaming" the system to gain an unfair advantage. Registrars were free to set whatever price point they determined the market would bear, but it was determined by NeuLevel that this price point would minimize such gaming of the system and that both Registrars and Registrants would benefit from a more level playing field.

Total Registry Operator expenditures for Marketing the .biz TLD

In 2001, the majority of NeuLevel's US\$10 million marketing activity was allocated to PR, Marketing Consulting and External Marketing/Advertising activity. The majority of the external advertising/marketing spending was focused online, so those expenses are not easily broken down by geographic region. In fact, language barriers aside, online advertising crosses all geographic boundaries over the Internet. In addition to our online advertising, NeuLevel decided that the best approach to drive awareness, interest and uptake of a gTLD focused on commercial use would be to target the international business community, and, more specifically, those with an existing on-line presence. As such, NeuLevel decided to divide our external marketing budget, minus the portion used for online advertising, based on percentages of online use broken down by geographic region. With the geographic percentages shown below, we allocated that approximate portion of our marketing budget to the appropriate region. We frontloaded our advertising and marketing so we would maximize interest and uptake for the IP Claim, DNA and Launch phases, so nearly all of our external marketing expenses took place in the 2nd, 3rd and 4th quarter, or approximately 30% of total in each of the last three quarters. The regional breakdown of these expenses is as follows:

Region	Percent
Africa	1.04%
Asia Pacific	31.76%
Europe	31.52%
Latin America/Caribbean	5.51%
North America	30.16%

NOTE: There were no domains under management in Phase 2 and no Registrars registering domains in Phase 2.

Total number of domain names under management Post Landrush Period on a quarterly basis by region; and Number of ICANN-Accredited Registrars, broken down by global region, registering domain names during the Post Landrush Period:

Region	Q102	Q202	Q302	Q402	Registrars
Africa	2,248	2,476	2,702	2,904	0
Asia Pacific	77,129	84,962	92,713	99,663	16
Europe	211,977	233,504	254,806	273,906	24
Latin America/Caribbean	9,389	10,343	11,286	12,132	0
North America	346,911	382,142	417,004	448,262	50

Definition of XRP

NeuLevel used the abbreviation "XRP," or Extensible Registry Protocol in our design of the Registry system and is the name of our EPP implementation for live Registry-Registrar transactions. NeuLevel did not use XRP during Phase 2 of the pre-launch process, rather, it was implemented for the actual launch and ongoing live registrations of the .biz gTLD. During Phase 2 (Domain Name Applications) NeuLevel received "batch file" submissions from Registrars. As such, there was no need for XRP transactions during Phase 2.

Whois and Equal Treatment of Registrars

Because Sections 6 & 7 were titled "Annual Report" NeuLevel will submit separate Annual Reports for each of the years of operation. These Annual Reports will be stand-alone documents and not part of this initial Proof of Concept Report. However, there were no reports of violation of the Code of Conduct during 2001.

Capital Requirements

In 2001, NeuLevel invested approximately US \$25 million in capital requirements, including infrastructure, hardware, software, development, testing, etc. This figure does not include marketing expenses covered in Section 8.4.1.

Registration Restrictions

No RDRP cases were filed with NeuLevel during the timeframe of this Proof of Concept Report.

10. Proof of Concept Data Tables

The following outline includes the data requirements outlined in Appendix U of the .biz Registry Agreement found online at <http://www.icann.org/tlds/agreements/biz/Registry-agmt-appu-11may01.htm>

Table 1 – Facts and Statistics

Category	Fact Detail
Total number of Trademark Claim Form Submissions (IP Claims)	80,008
Total fees collected for the IP Claims Service	\$6,357,304
Total number of domain names placed "on hold" by IPN Service	61,629
Total number of challenges submitted under the SUDRP (STOP)	809
Number of domain names subject to multiple SUDRP challenges	6 domains had 2; 1 domain had 4
Total Number of DNA	2,401,609
Number of DNA Domains (Group 1a - No corresponding IP Claim) Went live 10/01/01	167,816
Number of DNA Domains (Group 1b - One corresponding IP Claim) Went live 11/19/01	25,470
Number of DNA Domains (Group 2a -Multiple DNA from single applicant) Went live 11/19/01	46,462
Number of DNA Domains (Group 2b – Multiple DNA from multiple applicants) Went live 4/8/02	128,015
Number of applications submitted during RDNA for invalid domains	2,187
Total Registry Marketing expenditure for .biz in 2001	\$10,522,608
Number of ICANN-Accredited Registrars qualified to submit registrations on 11/7/01	70
Total number of domains registered resulting from Phase 2 - Pre-launch Landrush	279,403
Total number of domains registered on first day of Go-Live	59,962
Total number of domains registered during first week after Go-Live	139,877
Total number of domains registered during first month after Go-Live	291,838
Total number of domains registered during first year after Go-Live	521,255
Total number of domains registered during first year, including pre-launch and post-launch	800,658
Total amount of SLE Credits to ICANN-Accredited Registrars (C1a)	\$1,333.20 as of August 2002

Table 2 - Regional breakdown of IP Claim submissions

Region	# IP Claims
Africa	336
Asia Pacific	5,847
Europe	28,255
Latin America/Caribbean	1,148
North America	44,422

Table 3 - Total number "matches" between .biz strings submitted in the .biz domain name Applications and Trademark Claim Forms

Domain Name Applications	# DNA
DNA (Groups 1a, 1b, 2a)	1,278,498
RDNA (Group 2b)	128,015
Total	1,406,513

Table 4 - Total number of domain name requests cancelled by the applicant following IPN Service notice

Category	# Cancelled
Cancelled by applicant	79,627
Cancelled because of no response	118,458
Total	198,085

Table 5 - DNA/RDNA submissions, less the "cancelled" 2B DNA submissions

DNA (Round 1)		RDNA (Round 2)	
Date	DNA Volume	Date	RDNA Volume
8/29/2001	1,027	1/29/2002	507
8/30/2001	0	1/30/2002	0
8/31/2001	6,265	1/31/2002	0
9/1/2001	0	2/1/2002	0
9/2/2001	0	2/2/2002	0
9/3/2001	0	2/3/2002	0
9/4/2001	8,993	2/4/2002	0
9/5/2001	10,418	2/5/2002	0
9/6/2001	3	2/6/2002	0
9/7/2001	5,042	2/7/2002	0
9/8/2001	2	2/8/2002	21
9/9/2001	0	2/9/2002	0
9/10/2001	5,376	2/10/2002	0
9/11/2001	2,099	2/11/2002	3,781
9/12/2001	16,822	2/12/2002	3
9/13/2001	105,507	2/13/2002	0
9/14/2001	101,431	2/14/2002	13
9/15/2001	17,238	2/15/2002	0
9/16/2001	68,459	2/16/2002	0
9/17/2001	111,490	2/17/2002	0
9/18/2001	265,541	2/18/2002	3
9/19/2001	118,915	2/19/2002	4
9/20/2001	20,225	2/20/2002	514
9/21/2001	67,169	2/21/2002	257
9/22/2001	33,198	2/22/2002	2,621
9/23/2001	79,847	2/23/2002	0

DNA (Round 1)		RDNA (Round 2)	
Date	DNA Volume	Date	RDNA Volume
9/24/2001	151,868	2/24/2002	0
9/25/2001	14,699	2/25/2002	2,305
9/26/2001	20,960	2/26/2002	8,134
9/27/2001	131,564	2/27/2002	9,456
9/28/2001	844,639	2/28/2002	19,795
9/29/2001	127,699	3/1/2002	31,143
9/30/2001	65,113	3/2/2002	50,174
Total	2,401,609	3/3/2002	36,465
		3/4/2002	264,475
		3/5/2002	136,244
		3/6/2002	31,468
		3/22/2002	145
		Total	597,528
		Grand Total	2,999,137

Table 6 - Total Domain Name Application volume by week

DNA (Round 1)		RDNA (Round 2)	
Week of	Volumes	Week of	Volumes
8/26/02	7,292	1/27/02	507
9/2/02	24,458	2/3/02	21
9/9/02	248,473	2/10/02	3,797
9/16/02	684,997	2/17/02	3,399
9/23/02	1,371,276	2/24/02	121,007
9/30/02	65,113	3/3/02	468,652
Total	2,401,609	3/10/02	0
		3/17/02	145
		Total	597,528
		Grand Total	2,999,137

Table 7 - Total Domain Name Application volume with holder addresses in the regions described below

Region	DNA	RDNA
Africa	3,899	476
Antarctica	4	2
Asia/Pacific	146,756	134,469
Europe	742,064	119,113
Latin America/Caribbean	29,789	9,880
North America	1,479,097	333,588
Totals	2,401,609	597,528

Table 8 - Total number of ICANN-Accredited Registrars qualified to submit Domain Name Applications on each day of the Phase 1 Period

Date	# Registrars
8/21/2001	0
8/22/2001	1
8/23/2001	1
8/24/2001	1
8/25/2001	1
8/26/2001	1
8/27/2001	1
8/28/2001	1
8/29/2001	1
8/30/2001	2
8/31/2001	2
9/1/2001	3
9/2/2001	3
9/3/2001	4
9/4/2001	7
9/5/2001	10
9/6/2001	13
9/7/2001	19
9/8/2001	21
9/9/2001	23
9/10/2001	28
9/11/2001	32
9/12/2001	35
9/13/2001	37
9/14/2001	38
9/15/2001	41
9/16/2001	41
9/17/2001	45
9/18/2001	47
9/19/2001	48
9/20/2001	49
9/21/2001	60
9/22/2001	64
9/23/2001	64
9/24/2001	64
9/25/2001	64
9/26/2001	64
9/27/2001	64
9/28/2001	64
9/29/2001	64
9/30/2001	64
10/1/2001	64
10/2/2001	64
10/3/2001	64
10/4/2001	64
10/5/2001	64

Date	# Registrars
10/6/2001	64
10/7/2001	64
10/8/2001	64
10/9/2001	64
10/10/2001	64
10/11/2001	64
10/12/2001	64
10/13/2001	64
10/14/2001	64
10/15/2001	64
10/16/2001	64
10/17/2001	64
10/18/2001	64
10/19/2001	64

Table 9 - Total number of Domain Names Applications during the Phase 1 Period under the sponsorship of each ICANN-Accredited Registrar

Registrar	DNA	RDNA	Total
#1 Domain Names International, Inc.	6,241	0	6,241
007 Names, Inc.	372	3,662	4,034
1 eName Co	3,583	39,655	43,238
123 Registration, Inc.	948	14,215	15,163
1stDomain.Net	10,934	9,450	20,384
Abacus America, Inc. d/b/a Names4Ever.com	0	39,657	39,657
Alice's Registry, Inc.	0	152	152
All West Communications, Inc. (d.b.a. AWRegistry)	371	0	371
Alldomains.com Inc.	18,585	5,352	23,937
BB Online UK Limited	804	2,520	3,324
Blueberry Hill Communications, Inc. (d.b.a. Bluehill.com)	793	4,624	5,417
Bondi, LLC	0	613	613
BookMyName.com	4,795	40,943	45,738
BulkRegister.com, Inc.	64,978	39,656	104,634
Catalog.com, Inc.	1,784	728	2,512
CORE Internet Council of Registrars	21,692	4,353	26,045
Corporate Domains, Inc.	65,855	884	66,739
CSL Computer Service (d.b.a. Joker.com)	14,200	3,304	17,504
Direct Information Pvt. Ltd., (d.b.a. DirectI.com)	2,274	8,677	10,951
Domain Bank, Inc.	45,788	7,741	53,529
Domain People	7,007	10,848	17,855
Domain Pro, Inc	0	46	46
Domain Registration Services	77	685	762
Domaininfo AB	3,529	587	4,116
Dotster	53,018	10,208	63,226
EasySpace Ltd.	1,606	880	2,486
EchoKorea, Inc. d.b.a. DomainRG	1,183	487	1,670
eMarkmonitor, Inc.	37,941	602	38,543

Registrar	DNA	RDNA	Total
eNom, Inc.	21,722	45,742	67,464
Funpeas Media Ventures, LLC	0	1,735	1,735
Gabia Inc.	12,247	6,139	18,386
Gal Communications Ltd.	1,032	3,944	4,976
Global Media Online Inc.	5,416	5,556	10,972
Go Daddy Software, Inc.	22,466	0	22,466
Hangang Systems, Inc. d/b/a Doregi.com	1,313	6,871	8,184
I.D.R. Internet Domain Registry, Ltd.	116	3,122	3,238
IHoldings.com, Inc d/b/a DotRegistrar.com	0	31,674	31,674
Intercosmos Media Group, Inc. d.b.a. DirectNIC.com	9,338	7,727	17,065
Interdomain, S.A.	3,433	65	3,498
Internet Domain Registrars d.b.a. Registrars.com	28,364	0	28,364
Internetters Limited	0	792	792
Key-Systems GmbH	0	2,558	2,558
Melbourne IT d/b/a Internet Names World Wide	94,225	37,137	131,362
Namebay SAM	20,553	535	21,088
NameEngine, Inc.	113,340	2,049	115,389
Namescout.com	7,263	4,600	11,863
NameSecure.com, Inc.	1,198	0	1,198
Net Searchers International, LTD	0	228	228
NetBenefit d/b/a NetNames	26,422	1,359	27,781
Netpia.com, Inc.	4,299	7,031	11,330
Network Solutions Inc.	561,584	15,940	577,524
Nominalia Internet SL	7,822	1,695	9,517
Nordnet	12,985	3,455	16,440
OnlineNIC, Inc. d/b/a China-channel.com	1,506	2,128	3,634
Parava Networks, Inc.	651	15,272	15,923
Phillipine Registry.com, Inc.	41	524	565
PSI-Japan, Inc.	628	359	987
R&K Global Business Services, INC. (000domains.com)	532	758	1,290
Register.com	713,573	25,278	738,851
Registrars Asia PTY, LTD	1,985	11,067	13,052
Registration Technologies, Inc.	0	4,639	4,639
Schlund & Partner	25,004	10,676	35,680
Secura GmbH	4,903	5,327	10,230
Signature Domains	1,005	16	1,021
SiteName.com, LLC	0	50	50
Speednames Inc.	18,429	10,706	29,135
The Registry at Info Avenue	3,143	0	3,143
Tierra Net Inc. DBA Domain Discover	4,104	6,367	10,471
TLDs Inc.	1,862	25,664	27,526
Total Web Solutions d.b.a. Total Registrations	1,925	2,459	4,384
Tucows, Inc.	108,587	16,099	124,686
Virtual Internet, PLC	176,879	2,420	179,299
Wooho T&C Co. d/b/a RGNames	3,768	2,018	5,786
Xin Net Corp	208	964	1,172
YesNIC Co., Ltd.	9,380	14,254	23,634
Totals	2,401,609	597,528	2,999,137

Table 10 – Terms of Phase 2 registration requests (by Registrar, by Years) of the terms of Phase 2-Landrush registration requests submitted to the random selection .biz domain name processing system

Registrar	2 yr	3 yr	4 yr	5 yr	6 yr	7 yr	8 yr	9 yr	10 yr	Total
007 Names, Inc.	3,655	0	0	0	0	0	0	0	0	3,655
1 eName Co	39,655	0	0	0	0	0	0	0	0	39,655
123 Registration, Inc.	13,943	0	0	0	0	0	0	0	0	13,943
1stDomain.Net	9,184	0	0	14	0	0	0	0	71	9,269
Abacus America, Inc. d/b/a Names4Ever.com	39,608	0	0	0	0	0	0	0	0	39,608
Alice's Registry, Inc.	151	0	0	0	0	0	0	0	0	151
Alldomains.com Inc.	5,274	0	0	20	0	0	0	0	10	5,304
Ascio Technologies, Inc	10,302	0	0	0	0	0	0	0	0	10,302
BB Online UK Limited	2,447	0	0	0	0	0	0	0	0	2,447
Blueberry Hill Communications, Inc.	4,579	0	0	0	0	0	0	0	0	4,579
Bondi, LLC	608	0	0	0	0	0	0	0	0	608
BookMyName.com	31,805	0	0	0	0	0	0	0	0	31,805
BulkRegister.com, Inc.	39,646	0	0	0	0	0	0	0	0	39,646
Catalog.com, Inc.	718	0	0	0	0	0	0	0	0	718
CORE Internet Council of Registrars	4,263	0	0	1	0	0	0	0	0	4,264
Corporate Domains, Inc.	842	0	0	0	0	0	0	0	0	842
CSL Computer Service (d.b.a. Joker.com)	3,214	0	0	0	0	0	0	0	0	3,214
Domain Bank, Inc.	7,551	0	0	0	0	0	0	0	0	7,551
Domain People	10,715	4	1	9	1	0	1	0	4	10,735
Domain Pro, Inc	38	0	0	0	0	0	0	0	0	38
Domain Registration Services	685	0	0	0	0	0	0	0	0	685
Domaininfo AB	562	0	0	0	0	0	0	0	0	562
Dotster	9,920	0	0	0	0	0	0	0	0	9,920
EasySpace Ltd.	862	0	0	0	0	0	0	0	0	862
EchoKorea, Inc. d.b.a. DomainRG	479	1	0	0	0	0	0	0	0	480
eMarkmonitor, Inc.	576	0	0	0	0	0	0	0	0	576
eNom, Inc.	7,692	0	0	0	0	0	0	0	0	7,692
Funpeas Media Ventures, LLC	1,730	0	0	0	0	0	0	0	0	1,730
Gabia Inc.	6,101	0	0	0	0	0	0	0	0	6,101
Gal Communications Ltd.	3,914	0	0	0	0	0	0	0	0	3,914
Global Media Online Inc.	5,382	88	0	44	4	0	0	0	24	5,542
Hangang Systems, Inc. d/b/a Doregi.com	6,629	0	0	0	0	0	0	0	0	6,629
I.D.R. Internet Domain Registry, Ltd.	3,080	0	0	0	0	0	0	0	0	3,080
IHoldings.com, Inc d/b/a DotRegistrar.com	31,484	0	0	0	0	0	0	0	0	31,484
Intercosmos Media Group dba DirectNIC	7,401	0	0	0	0	0	0	0	0	7,401
Interdomain, S.A.	55	8	0	0	0	0	0	0	0	63
Internetters Limited	350	0	0	221	0	0	0	0	208	779
Key-Systems GmbH	2,515	0	0	0	0	0	0	0	0	2,515
Melbourne IT dba Internet Names World Wide	35,938	74	15	348	10	0	1	1	253	36,640
Namebay SAM	521	0	0	0	0	0	0	0	0	521
NameEngine, Inc.	1,852	0	0	0	0	0	0	0	0	1,852
Namescout.com	4,453	0	0	0	0	0	0	0	0	4,453
Net Searchers International, LTD.	226	0	0	0	0	0	0	0	0	226
NetBenefit d/b/a NetNames	1,230	0	0	0	0	0	0	0	46	1,276
Netpia.com, Inc.	3,947	0	0	0	0	0	0	0	0	3,947

Registrar	2 yr	4 yr	5 yr	7 yr	8 yr	10 yr	Total
Network Solutions Inc.	15,684	0	0	0	0	0	15,684
Nominalia Internet SL	413	0	0	0	0	0	413
Nordnet	3,455	0	0	0	0	0	3,455
OnlineNIC, Inc. d/b/a China-channel.com	2,117	0	0	0	0	0	2,117
Parava Networks, Inc.	6,493	0	0	0	0	0	6,493
Phillipine Registry.com, Inc.	516	0	0	0	0	0	516
PSI-Japan, Inc.	344	0	0	0	0	3	347
R&K Global Business Services, INC.	751	0	0	0	0	0	751
Register.com	25,158	0	0	0	0	0	25,158
Registrars Asia PTY, LTD	1,898	0	0	0	0	0	1,898
Registration Technologies, Inc.	4,595	0	0	0	0	0	4,595
Schlund & Partner	10,311	0	0	0	0	0	10,311
Secura GmbH	5,228	0	0	0	0	0	5,228
Signature Domains	16	0	0	0	0	0	16
SiteName.com, LLC	43	0	0	0	0	5	48
Tierra Net Inc. DBA Domain Discover	6,329	0	0	0	0	0	6,329
TLDs Inc.	25,664	0	0	0	0	0	25,664
Total Web Solutions d.b.a. Total Registrations	2,455	1	0	0	0	0	2,456
Tucows, Inc.	10,666	9	0	8	0	5	10,688
Virtual Internet, PLC	2,378	0	0	0	0	0	2,378
Wooho T&C Co. d/b/a RGNames	1,933	0	0	0	0	0	1,933
Xin Net Corp	964	0	0	0	0	0	964
YesNIC Co., Ltd.	10,058	19	2	21	0	3	10,103
Totals	503,251	204	18	686	15	632	504,809

Table 11 - The following table provides a breakdown (by Registrar and by Years) of the terms of the domains registered as a result of the random selection process during Phase 2

Registrar	2 yr	3 yr	4 yr	5 yr	10 yr	Total
007 Names, Inc.	470	0	0	0	0	470
1 eName Co	2,254	0	0	0	0	2,254
123 Registration, Inc.	298	0	0	0	0	298
1stDomain.Net	585	0	0	1	11	597
Abacus America, Inc. d/b/a Names4Ever.com	2,279	0	0	0	0	2,279
Alice's Registry, Inc.	90	0	0	0	0	90
Alldomains.com Inc.		0	0	14	3	650
Ascio Technologies, Inc	942	0	0	0	0	942
BB Online UK Limited	295	0	0	0	0	295
Blueberry Hill Communications, Inc. (d.b.a. Bluehill.com)	404	0	0	0	0	404
Bondi, LLC	100	0	0	0	0	100
BookMyName.com	2,143	0	0	0	0	2,143
BulkRegister.com, Inc.	2,249	0	0	0	0	2,249
Catalog.com, Inc.	212	0	0	0	0	212
CORE Internet Council of Registrars	802	0	0	0	0	802
Corporate Domains, Inc.	508	0	0	0	0	508
CSL Computer Service (d.b.a. Joker.com)	699	0	0	0	0	699

Registrar	2 yr	3 yr	4 yr	5 yr	10 yr	Total
Domain Bank, Inc.	611	0	0	0	0	611
Domain People	879	0	0	1	1	881
Domain Pro, Inc	24	0	0	0	0	24
Domain Registration Services	225	0	0	0	0	225
Domaininfo AB	296	0	0	0	0	296
Dotster	906	0	0	0	0	906
EasySpace Ltd.	330	0	0	0	0	330
EchoKorea, Inc. d.b.a. DomainRG	228	0	0	0	0	228
eMarkmonitor, Inc.	307	0	0	0	0	307
eNom, Inc.	687	0	0	0	0	687
Funpeas Media Ventures, LLC	328	0	0	0	0	328
Gabia Inc.	251	0	0	0	0	251
Gal Communications Ltd.	326	0	0	0	0	326
Global Media Online Inc.	238	10	0	5	4	257
Hangang Systems, Inc. d/b/a Doregi.com	840	0	0	0	0	840
I.D.R. Internet Domain Registry, Ltd.	429	0	0	0	0	429
IHoldings.com, Inc d/b/a DotRegistrar.com	509	0	0	0	0	509
Intercosmos Media Group, Inc. d.b.a. DirectNIC.com	906	0	0	0	0	906
Interdomain, S.A.	53	7	0	0	0	60
Internetters Limited	133	0	0	35	43	211
Key-Systems GmbH	570	0	0	0	0	570
Melbourne IT d/b/a Internet Names World Wide	754	2	1	20	8	785
Namebay SAM	225	0	0	0	0	225
NameEngine, Inc.	851	0	0	0	0	851
Namescout.com	561	0	0	0	0	561
Net Searchers International, LTD.	166	0	0	0	0	166
NetBenefit d/b/a NetNames	550	0	0	0	24	574
Netpia.com, Inc.	170	0	0	0	0	170
Network Solutions Inc.	1,804	0	0	0	0	1,804
Nominalia Internet SL	264	0	0	0	0	264
Nordnet	214	0	0	0	0	214
OnlineNIC, Inc. d/b/a China-channel.com	265	0	0	0	0	265
Parava Networks, Inc.	466	0	0	0	0	466
Phillipine Registry.com, Inc.	123	0	0	0	0	123
PSI-Japan, Inc.	171	0	0	0	3	174
R&K Global Business Services, INC. (000domains.com)	232	0	0	0	0	232
Register.com	1,594	0	0	0	0	1,594
Registrars Asia PTY LTD	172	0	0	0	0	172
Registration Technologies, Inc.	643	0	0	0	0	643
Schlund & Partner	1,368	0	0	0	0	1,368
Secura GmbH	587	0	0	0	0	587
Signature Domains	10	0	0	0	0	10
SiteName.com, LLC	17	0	0	0	2	19
Tierra Net Inc. DBA Domain Discover	579	0	0	0	0	579
TLDs Inc.	192	0	0	0	0	192
Total Web Solutions d.b.a. Total Registrations	236	0	0	0	0	236

Registrar	2 yr	3 yr	4 yr	5 yr	10 yr	Total
Tucows, Inc.	982	2	0	0	0	984
Virtual Internet, PLC	928	0	0	0	0	928
Wooho T&C Co. d/b/a RGNames	272	0	0	0	0	272
Xin Net Corp	152	0	0	0	0	152
YesNIC Co., Ltd.	284	0	0	1	1	286
Total	38,871	21	1	77	100	39,070

Table 12 – Number of domains sponsored by each Registrar that were subject to at least one SUDRP challenge

Registrar	# SUDRP
007 Names, Inc.	19
1 eName Co	0
123 Registration, Inc.	6
1stDomain.Net	4
Abacus America, Inc. d/b/a Names4Ever.com	1
Alldomains.com Inc.	11
Ascio Technologies Inc.	15
BB Online UK Limited	9
Blueberry Hill Communications, Inc. (d.b.a. Bluehill.com)	9
Bondi LLC	8
BookMyName.com	1
BulkRegister.com, Inc.	3
Catalog.com, Inc.	4
Communi Gal Communications Ltd.	11
CORE Internet Council of Registrars	10
Corporate Domains, Inc.	10
Cronon AG	0
CSL Computer Service (d.b.a. Joker.com)	4
Direct Information Pvt. Ltd., (d.b.a. Directl.com)	0
Domain Bank, Inc.	6
Domain People	12
DomainDiscover	7
Domaininfo AB	1
DomainPro, Inc.	1
Dotster	18
EasySpace Ltd.	5
EchoKorea, Inc. d.b.a. DomainRG	8
eMarkmonitor, Inc.	2
eNom, Inc.	11
Funpeas Media Ventures, LLC	2
Gabia Inc.	14
Global Media Online Inc.	2
Go Daddy Software, Inc.	3
Hangang Systems, Inc. d/b/a Doregi.com	22
I.D.R. Internet Domain Registry, Ltd.	7

Registrar	# SUDRP
iHoldings.com, Inc. d/b/a DotRegistrar.com	24
Intercosmos Media Group, Inc. d.b.a. DirectNIC.com	16
Interdomain, S.A.	1
Internetters Limited	4
Key-Systems GmbH	9
Melbourne IT d/b/a Internet Names World Wide	16
Namebay SAM	4
NameEngine, Inc.	5
Namescout.com	17
Net Searchers International, Ltd.	1
NetBenefit d/b/a NetNames	7
Netpia.com, Inc.	8
Network Solutions Inc.	64
Nominalia Internet SL	5
Nordnet	4
OnlineNIC, Inc. d/b/a China-channel.com	10
Parava Networks, Inc.	2
Phillipine Registry.com, Inc.	6
PSI-Japan, Inc.	18
R&K Global Business Services, INC. (000domains.com)	5
Register.com	28
Registrars Asia PTY, LTD	6
Registration Technologies, Inc.	8
Schlund + Partner AG	12
Secura GmbH	5
Signature Domains	4
SiteName.com, LLC	1
TLDs Inc.	9
Total Web Solutions d.b.a. Total Registrations	3
Tucows, Inc.	19
Virtual Internet, PLC	8
Wooho T&C Co. d/b/a RGNames.com	13
Xin Net Corp	9
YesNIC Co., Ltd.	17

Table 13 - The number of successful and unsuccessful SUDRP challenges broken down by country of Registrant

Country	Denied	Transfer
Antigua (AG)	0	1
Austria (AT)	0	1
Australia (AU)	13	8
Barbados (BB)	0	1
Belgium (BE)	1	1
Brazil (BR)	1	1

Country	Denied	Transfer
Canada (CA)	15	24
Switzerland (CH)	3	2
Chile (CL)	1	1
China (CN)	7	9
Czech Republic (CZ)	0	0
Germany (DE)	22	16
Denmark (DK)	5	2
Egypt (EG)	0	1
Spain (ES)	7	2
Finland (FI)	1	0
France (FR)	7	4
Hungary (HU)	3	1
Indonesia (ID)	2	1
Israel (IL)	1	1
Italy (IT)	2	3
Jamaica (JM)	0	1
Japan (JP)	4	4
Korea (KR)	28	56
Cayman Islands (KY)	0	0
Sri Lanka (LK)	1	0
Luxemburg (LU)	1	0
Northern Mariana Islands (MP)	2	0
Malaysia (MY)	1	0
Netherlands (NL)	2	4
Norway (NO)	2	1
New Zealand (NZ)	2	0
Pakistan (PK)	3	2
Poland (PL)	0	1
Portugal (PT)	0	1
Sweden (SE)	1	5
Singapore (SG)	0	0
Slovakia (SK)	2	1
Thailand (TH)	2	1
Turkey (TR)	1	0
Taiwan (TW)	2	12
United Kingdom (UK)	27	13
United States (US)	132	118
South Africa (ZA)	1	0

Table 14 – Number of domain names, broken down by sponsoring Registrar, involved in challenges where the holder failed to submit any materials after receiving notification of the SUDRP challenge

The dispute resolution providers provided NeuLevel the total numbers of cases where the respondent failed to respond to their request for evidence that the respondent had rights to a contested name. There was no breakdown of these numbers in terms of the affected domain names. The data obtained from the Dispute Resolution Providers was broken down as follows:

1. Total Number of Cases Initiated	945	1203
2. Cases Terminated for Lack of Sufficient "Evidence"	533	813
3. Cases decided for Respondent, no further challenges	84	118
4. Decided against Complainant, with further challenges	55	41
5. Decided for Complainant, no further STOP challenges	185	107
6. Terminated at Complainant's request	88	71
7. Cases where Respondent failed to respond	151	199

However, not all the cases in Category 7 were decided in favor of the Complainant.

Table 15 - Number of domains subject to a successful SUDRP challenge broken down by Region of Registrant's address

Region	# Domains
Africa	0
Asia Pacific	28
Europe	76
Latin America/Caribbean	2
North America	194
Total	300

Table 16 - Number of domain names subject to successful SUDRP challenges, broken down by region of Challenger's address

All successful challengers registered, or have shown intent to register, the disputed domain names. Therefore, there have been no cases where subsequent challengers have been offered an opportunity to challenge the first challenger, or to register the name in question.

Region	# Domains
Africa	1
Asia Pacific	93
Europe	59
Latin America/Caribbean	5
North America	142
Total	300

Table 17 - Total number of domain names granted during Registry Live broken down by ICANN-Accredited Registrar. For the questions concerning the “Registry Live” period, the dates of 11/7/01 through 5/6/02 were used

Registrar	Registrations
#1 Domain Names International, Inc.	138
007 Names, Inc.	671
1 eName Co	3,227
123 Registration, Inc.	893
1stDomain.Net	2,265
Abacus America, Inc. d/b/a Names4Ever.com	4,034
Address Creation	164
Alice's Registry, Inc.	96
All West Communications, Inc. (d.b.a. AWRRegistry)	142
Alldomains.com Inc.	3,854
Ascio Technologies Inc.	9,337
BB Online UK Limited	490
Blueberry Hill Communications, Inc. (d.b.a. Bluehill.com)	737
Bondi LLC	100
BookMyName.com	2,833
BulkRegister.com, Inc.	20,451
Capital Networks Pty, Ltd.	6
Catalog.com, Inc.	869
Communi Gal Communications Ltd.	502
CORE Internet Council of Registrars	12,338
Corporate Domains, Inc.	2,911
Cronon AG	1,050
CSL Computer Service (d.b.a. Joker.com)	12,978
Direct Information Pvt. Ltd., (d.b.a. DirectI.com)	893
Domain Bank, Inc.	3,227
Domain People	4,835
Domain Registration Services	595
DomainDiscover	8,599
Domaininfo AB	3,055
DomainPro, Inc.	24
DomainZoo.com, Inc.	46
Dotster	9,612
EasySpace Ltd.	4,019
EchoKorea, Inc. d.b.a. DomainRG	383
eMarkmonitor, Inc.	1,369
eNom, Inc.	24,289
Funpeas Media Ventures, LLC	328
Gabia Inc.	6,326
Gandi SARL	743
Global Media Online Inc.	1,813
Globedom Datenkommunikations GmbH	120
Go Daddy Software, Inc.	17,569
Hangang Systems, Inc. d/b/a Doregi.com	2,304

Registrar	Registrations
I.D.R. Internet Domain Registry, Ltd.	526
iHoldings.com, Inc. d/b/a DotRegistrar.com	23,284
InnerWise, Inc. d.b.a. ItsYourDomain.com	6,711
Intercosmos Media Group, Inc. d.b.a. DirectNIC.com	17,150
Interdomain, S.A.	423
Internet Domain Registrars d.b.a. Registrars.com	2,399
Internetters Limited	233
Key-Systems GmbH	6,967
Melbourne IT d/b/a Internet Names World Wide	28,767
Namebay SAM	2,360
NameEngine, Inc.	1,971
Namescout.com	1,714
Namesdirect.com, Inc.	10
NameSecure.com, Inc.	2,792
Net Searchers International, Ltd.	166
NetBenefit d/b/a NetNames	3,060
Netpia.com, Inc.	3,122
Network Solutions Inc.	89,611
Nominalia Internet SL	1,986
Nordnet	1,678
Omnis Networks, LLC.	107
OnlineNIC, Inc. d/b/a China-channel.com	2,662
Parava Networks, Inc.	1,344
Phillipine Registry.com, Inc.	215
PSI-Japan, Inc.	327
R&K Global Business Services, INC. (000domains.com)	1,922
Register.com	53,427
Registrars Asia PTY, LTD	656
Registration Technologies, Inc.	643
Schlund + Partner AG	15,759
Secura GmbH	1,388
Signature Domains	466
SiteName.com, LLC	19
The NameIT Corporation d.b.a. Aitdomains.com	1,087
The Registry at Info Avenue	221
TLDs Inc.	15,723
Total Web Solutions d.b.a. Total Registrations	2,435
Transpac	33
Tucows, Inc.	41,179
Virtual Internet, PLC	6,266
Wooho T&C Co. d/b/a RGNames.com	325
Xin Net Corp	539
YesNIC Co., Ltd.	6,707
Total	518,615

Table 18 - Total number of domain names granted during Registry Live broken down by domain name holder having addresses in the regions described below

Region	Registrations
Africa	1,631
Asia/Pacific	60,961
Europe	163,040
Latin America/Caribbean	5,728
North America	287,255
Total	518,615

Table 19 - Total number of domain names "on hold" at the Commencement-of-Service Date

As of Date	Reason for Hold	# Domains on Hold
11/7/2001	IP claim matches	42,989
11/7/2001	Group 2B litigation	39,670
3/27/2002	RDNA (2B) IP claim matches	9,063

Table 20 - Total initial domain name registration volume by day during Registry Live

Date	Registrations
11/7/2001	59,962
11/8/2001	27,937
11/9/2001	18,799
11/10/2001	10,836
11/11/2001	5,737
11/12/2001	9,128
11/13/2001	7,478
11/14/2001	6,860
11/15/2001	6,910
11/16/2001	6,530
11/17/2001	2,826
11/18/2001	1,900
11/19/2001	77430
11/20/2001	5,579
11/21/2001	4,279
11/22/2001	3,010
11/23/2001	2,760
11/24/2001	2,149
11/25/2001	1,627
11/26/2001	3,032
11/27/2001	3,133
11/28/2001	3,623
11/29/2001	3,674
11/30/2001	3,298
12/1/2001	1,504
12/2/2001	1,108

Date	Registrations
12/3/2001	2,698
12/4/2001	2,852
12/5/2001	2,754
12/6/2001	2,425
12/7/2001	2,354
12/8/2001	1,035
12/9/2001	886
12/10/2001	2,051
12/11/2001	2,463
12/12/2001	2,431
12/13/2001	2,069
12/14/2001	1,899
12/15/2001	1,027
12/16/2001	657
12/17/2001	1,810
12/18/2001	1,932
12/19/2001	2,016
12/20/2001	1,881
12/21/2001	1,754
12/22/2001	864
12/23/2001	586
12/24/2001	740
12/25/2001	525
12/26/2001	710
12/27/2001	1,347
12/28/2001	1,302
12/29/2001	709
12/30/2001	646
12/31/2001	910
1/1/2002	508
1/2/2002	1,495
1/3/2002	1,657
1/4/2002	1,750
1/5/2002	805
1/6/2002	667
1/7/2002	1,552
1/8/2002	1,618
1/9/2002	1,527
1/10/2002	1,844
1/11/2002	1,804
1/12/2002	796
1/13/2002	677
1/14/2002	1,559
1/15/2002	1,861
1/16/2002	1,776
1/17/2002	1,695
1/18/2002	1,595
1/19/2002	457

Date	Registrations
1/20/2002	508
1/21/2002	1,491
1/22/2002	1,673
1/23/2002	1,631
1/24/2002	1,653
1/25/2002	1,726
1/26/2002	787
1/27/2002	611
1/28/2002	1,919
1/29/2002	1,548
1/30/2002	1,748
1/31/2002	1,654
2/1/2002	1,578
2/2/2002	750
2/3/2002	648
2/4/2002	1,523
2/5/2002	1,557
2/6/2002	1,686
2/7/2002	1,785
2/8/2002	1,670
2/9/2002	786
2/10/2002	510
2/11/2002	1,336
2/12/2002	1,496
2/13/2002	1,526
2/14/2002	1,461
2/15/2002	1,672
2/16/2002	762
2/17/2002	548
2/18/2002	1,286
2/19/2002	1,420
2/20/2002	1,283
2/21/2002	1,333
2/22/2002	1,477
2/23/2002	697
2/24/2002	533
2/25/2002	1,316
2/26/2002	1,552
2/27/2002	1,611
2/28/2002	1,731
3/1/2002	1,473
3/2/2002	726
3/3/2002	559
3/4/2002	1,367
3/5/2002	1,459
3/6/2002	1,494
3/7/2002	1,466
3/8/2002	1,386
3/9/2002	641
3/10/2002	553
3/11/2002	1,373
3/12/2002	1,423
3/13/2002	1,479
3/14/2002	1,479

Date	Registrations
3/15/2002	1,320
3/16/2002	720
3/17/2002	541
3/18/2002	1,361
3/19/2002	1,354
3/20/2002	1,650
3/21/2002	1,353
3/22/2002	1,524
3/23/2002	596
3/24/2002	514
3/25/2002	1,203
3/26/2002	1,276
3/27/2002	40,452
3/28/2002	1,791
3/29/2002	1,258
3/30/2002	723
3/31/2002	668
4/1/2002	1,346
4/2/2002	1,663
4/3/2002	1,585
4/4/2002	1,416
4/5/2002	1,299
4/6/2002	661
4/7/2002	437
4/8/2002	1,447
4/9/2002	1,424
4/10/2002	1,421
4/11/2002	1,353
4/12/2002	1,291
4/13/2002	594
4/14/2002	396
4/15/2002	1,212
4/16/2002	1,303
4/17/2002	1,278
4/18/2002	1,384
4/19/2002	1,253
4/20/2002	556
4/21/2002	468
4/22/2002	1,191
4/23/2002	1,239
4/24/2002	1,473
4/25/2002	1,318
4/26/2002	1,207
4/27/2002	548
4/28/2002	518
4/29/2002	1,202
4/30/2002	1,225
5/1/2002	944
5/2/2002	1,150
5/3/2002	1,245
5/4/2002	383
5/5/2002	428
5/6/2002	1,008
Total	518,615

Table 21 - Total initial domain name registration volume by week

Week of	Registrations
11/4/2001	117,534
11/11/2001	45,469
11/18/2001	97107
11/25/2001	19,891
12/2/2001	15,226
12/9/2001	12,826
12/16/2001	10,914
12/23/2001	5,919
12/30/2001	7,771
1/6/2002	9,808
1/13/2002	9,620
1/20/2002	9,469
1/27/2002	9,808
2/3/2002	9,655
2/10/2002	8,763
2/17/2002	8,044
2/24/2002	8,942
3/3/2002	8,372
3/10/2002	8,347
3/17/2002	8,379
3/24/2002	47,217
3/31/2002	8,638
4/7/2002	7,967
4/14/2002	7,382
4/21/2002	7,444
4/28/2002	6,667
5/5/2002	1,436
Total	518,615

Table 22 - Total number of domain names registered during each month of the Registry live Period under the sponsorship of each ICANN-Accredited Registrar

Registrar	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02	Total
#1 Domain Names International, Inc.	96	19	5	2	5	10	1	138
007 Names, Inc.	120	19	9	9	474	16	24	671
1 eName Co	607	94	75	65	2,349	30	7	3,227
123 Registration, Inc.	446	32	36	29	314	35	1	893
1stDomain.Net	1,600	22	6	9	610	16	2	2,265
Abacus America, Inc. d/b/a Names4Ever.com	809	236	239	185	2,418	121	26	4,034
Address Creation	10	29	32	32	35	26	0	164
Alice's Registry, Inc.	0	0	0	0	91	2	3	96
All West Communications, Inc. (AWRegistry)	18	0	23	36	27	35	3	142
Alldomains.com Inc.	2,475	204	153	130	784	92	16	3,854
Ascio Technologies Inc.	4,717	1,109	808	587	1,529	535	52	9,337
BB Online UK Limited	115	14	13	11	318	19	0	490
Blueberry Hill Communications, Inc. (Bluehill.com)	141	54	36	39	436	25	6	737
Bondi LLC	0	0	0	0	100	0	0	100
BookMyName.com	524	52	45	25	2,165	20	2	2,833
BulkRegister.com, Inc.	12,582	1,400	1,284	1,024	3,173	830	158	20,451

Registrar	Nov-01		Jan-02	Feb-02	Apr-02		May-02
Capital Networks Pty, Ltd.	0	0	0	0	5		6
Catalog.com, Inc.	302	86		73	264	6	869
Communi Gal Communications Ltd.	165		5	0	0	0	502
CORE Internet Council of Registrars	7,177	1,102	996		1,554	670	12,338
Corporate Domains, Inc.	2,308	22		18	516	2	2,911
	50	266	178	147	179	69	1,050
	6,604		1,304	978	1,671	760	116
Direct Information Pvt. Ltd., (d.b.a. Directl.com)		73	66		49	62	893
Domain Bank, Inc.	1,271	270		188	905	275	3,227
	2,916		196	174		212	27
Domain Registration Services		33	25		238	12	595
DomainDiscover	4,943	677		387	1,167	71	8,599
	1,826		232	161		103	15
DomainPro, Inc.		0	0		24	0	24
DomainZoo.com, Inc.	0	0		10	10	0	46
	4,781		718	711		607	106
EasySpace Ltd.		402	429		644	273	4,019
EchoKorea, Inc. d.b.a. DomainRG	154	0		0	229	0	383
	865		102	10		20	4
eNom, Inc.		2,776	2,744		3,051	2,368	24,289
Funpeas Media Ventures, LLC	0	0		0	328	0	328
	3,649	382	322	343		897	75
Gandi SARL		0	0		0	648	743
Global Media Online Inc.	780	196		113	430	14	1,813
	0		34	30		27	6
Go Daddy Software, Inc.		2,244	2,154		1,955	2,486	17,569
Hangang Systems, Inc. d/b/a Doregi.com	881	149		56	884	20	2,304
	86		2	1		3	0
iHoldings.com, Inc. d/b/a DotRegistrar.com		1,711	943		1,226	694	23,284
InnerWise, Inc. d.b.a. ItsYourDomain.com	2,096	839		755	1,166	115	6,711
DirectNIC.com	10,025		1,256	1,165		951	144
Interdomain, S.A.	251	19	11		91	17	423
Internet Domain Registrars d.b.a. Registrars.com	1,848	333		26	0	0	2,399
	0		0	0		15	0
Key-Systems GmbH	5,201		283	179		263	21
Melbourne IT d/b/a Internet Names World Wide	13,100	3,444	3,395		3,374	2,239	28,767
Namebay SAM	1,364	276		137	339	20	2,360
	1,096		0	0		23	0
Namescout.com	696	124	87	72	642	70	1,714
Namesdirect.com, Inc.	0	0	0	0	0	3	7
NameSecure.com, Inc.	951	281	225	188	542	523	2,792
	0	0	0	0	166	0	166
NetBenefit d/b/a NetNames	1,452	67	127	456	775	161	3,060
Netpia.com, Inc.	2,320	177	137	89	286	109	3,122
Network Solutions Inc.	49,193	8,874	8,627	7,597	8,918	5,561	89,611
Nominalia Internet SL	1,013	167	173	180	355	91	1,986
Nordnet	971	198	92	87	283	29	1,678
Omnis Networks, LLC.	0	0	13	37	31	21	107

Registrar	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02	Total
OnlineNIC, Inc. d/b/a China-channel.com	1,295	214	289	163	456	231	14	2,662
Parava Networks, Inc.	462	91	117	68	526	67	13	1,344
Phillipine Registry.com, Inc.	58	6	9	8	126	8	0	215
PSI-Japan, Inc.	95	13	14	13	182	9	1	327
R&K Global Business Services (000domains.com)	782	274	209	120	348	159	30	1,922
Register.com	33,163	4,754	4,009	3,736	4,819	2,596	350	53,427
Registrars Asia PTY, LTD	393	28	23	6	179	23	4	656
Registration Technologies, Inc.	0	0	0	0	643	0	0	643
Schlund + Partner AG	6,607	1,501	1,290	1,426	3,010	1,697	228	15,759
Secura GmbH	590	51	56	49	613	25	4	1,388
Signature Domains	285	47	30	16	76	12	0	466
SiteName.com, LLC	0	0	0	0	19	0	0	19
The NameIT Corporation d.b.a. Aitdomains.com	867	36	62	44	33	40	5	1,087
The Registry at Info Avenue	40	3	41	53	37	40	7	221
TLDs Inc.	12,342	843	490	433	819	725	71	15,723
Total Web Solutions d.b.a. Total Registrations	1,298	277	163	188	362	127	20	2,435
Transpac	0	0	3	1	16	13	0	33
Tucows, Inc.	18,628	5,622	4,660	3,712	4,916	3,217	424	41,179
Virtual Internet, PLC	4,878	84	94	122	993	85	10	6,266
Wooho T&C Co. d/b/a RGNames.com	35	0	0	4	272	14	0	325
Xin Net Corp	134	84	62	25	188	45	1	539
YesNIC Co., Ltd.	3,886	673	531	332	589	608	88	6,707
Total	318,133	47,945	42,592	35,533	75,252	33,708	5,158	518,615

Table 23 – The following table provides the names of the Registrars and the number of DNA collected from each

Registrar	Applications
007 Names, Inc.	3,662
1 eName Co	39,655
123 Registration, Inc.	14,215
1stDomain.Net	9,450
Abacus America, Inc. d/b/a Names4Ever.com	39,657
Alice's Registry, Inc.	152
Alldomains.com Inc.	5,352
Ascio Technologies, Inc	10,706
BB Online UK Limited	2,520
Blueberry Hill Communications, Inc. (d.b.a. Bluehill.com)	4,624
BONDI, LLC	613
BookMyName.com	40,943
BulkRegister.com, Inc.	39,656
Catalog.com, Inc.	728
CORE Internet Council of Registrars	4,353
Corporate Domains, Inc.	884
CSL Computer Service (d.b.a. Joker.com)	3,304
Direct Information Pvt. Ltd., (d.b.a. Directl.com)	8,677
Domain Bank, Inc.	7,741
Domain People	10,848

Registrar	Applications
Domain Pro, Inc	46
Domain Registration Services	685
Domaininfo AB	587
Dotster	10,208
EasySpace Ltd.	880
EchoKorea, Inc. d.b.a. DomainRG	487
eMarkmonitor, Inc.	602
eNom, Inc.	45,742
FUNPEAS MEDIA VENTURES, LLC	1,735
Gabia Inc.	6,139
Gal Communications Ltd.	3,944
Global Media Online Inc.	5,556
Hangang Systems, Inc. d/b/a Doregi.com	6,871
I.D.R. Internet Domain Registry, Ltd.	3,122
IHoldings.com, Inc d/b/a DotRegistrar.com	31,674
Intercosmos Media Group, Inc. d.b.a. DirectNIC.com	7,727
Interdomain, S.A.	65
INTERNETTERS LIMITED	792
Key-Systems GmbH	2,558
Melbourne IT d/b/a Internet Names World Wide	37,137
Namebay SAM	535
NameEngine, Inc.	2,049
Namescout.com	4,600
NET SEARCHERS INTERNATIONAL, LTD.	228
NetBenefit d/b/a NetNames	1,359
Netpia.com, Inc.	7,031
Network Solutions Inc.	15,940
Nominalia Internet SL	1,695
Nordnet	3,455
OnlineNIC, Inc. d/b/a China-channel.com	2,128
Parava Networks, Inc.	15,272
Phillipine Registry.com, Inc.	524
PSI-Japan, Inc.	359
R&K Global Business Services, INC. (000domains.com)	758
Register.com	25,278
REGISTRARS ASIA PTY LTD	11,067
Registration Technologies, Inc.	4,639
Schlund & Partner	10,676
Secura GmbH	5,327
Signature Domains	16
SiteName.com, LLC	50
Tierra Net Inc. DBA Domain Discover	6,367
TLDs Inc.	25,664
Total Web Solutions d.b.a. Total Registrations	2,459
Tucows, Inc.	16,099
Virtual Internet, PLC	2,420
Wooho T&C Co. d/b/a RGNames	2,018
Xin Net Corp	964
YesNIC Co., Ltd.	14,254
Total	597,528

Table 24 – The number of domain names granted for each Registrar during Phase 2 Landrush

Registrar	Successful DNA
007 Names, Inc.	470
1 eName Co	2,254
123 Registration, Inc.	298
1stDomain.Net	597
Abacus America, Inc. d/b/a Names4Ever.com	2,279
Alice's Registry, Inc.	90
Alldomains.com Inc.	650
Ascio Technologies, Inc	942
BB Online UK Limited	295
Blueberry Hill Communications, Inc. (d.b.a. Bluehill.com)	404
Bondi, LLC	100
BookMyName.com	2,143
BulkRegister.com, Inc.	2,249
Catalog.com, Inc.	212
CORE Internet Council of Registrars	802
Corporate Domains, Inc.	508
CSL Computer Service (d.b.a. Joker.com)	699
Domain Bank, Inc.	611
Domain People	881
Domain Pro, Inc	24
Domain Registration Services	225
Domaininfo AB	296
Dotster	906
EasySpace Ltd.	330
EchoKorea, Inc. d.b.a. DomainRG	228
eMarkmonitor, Inc.	307
eNom, Inc.	687
Funpeas Media Ventures, LLC	328
Gabia Inc.	251
Gal Communications Ltd.	326
Global Media Online Inc.	257
Hangang Systems, Inc. d/b/a Doregi.com	840
I.D.R. Internet Domain Registry, Ltd.	429
IHoldings.com, Inc d/b/a DotRegistrar.com	509
Intercosmos Media Group, Inc. d.b.a. DirectNIC.com	906
Interdomain, S.A.	60
Internetters Limited	211
Key-Systems GmbH	570
Melbourne IT d/b/a Internet Names World Wide	785
Namebay SAM	225
NameEngine, Inc.	851
Namescout.com	561
Net Searchers International, LTD.	166
NetBenefit d/b/a NetNames	574
Netpia.com, Inc.	170
Network Solutions Inc.	1,804
Nominalia Internet SL	264
Nordnet	214
OnlineNIC, Inc. d/b/a China-channel.com	265
Parava Networks, Inc.	466
Phillipine Registry.com, Inc.	123

Registrar	Successful DNA
PSI-Japan, Inc.	174
R&K Global Business Services, INC. (000domains.com)	232
Register.com	1,594
Registrars Asia PTY LTD	172
Registration Technologies, Inc.	643
Schlund & Partner	1,368
Secura GmbH	587
Signature Domains	10
SiteName.com, LLC	19
Tierra Net Inc. DBA Domain Discover	579
TLDs Inc.	192
Total Web Solutions d.b.a. Total Registrations	
Tucows, Inc.	
Virtual Internet, PLC	
Wooho T&C Co. d/b/a RGNames	
Xin Net Corp	152
	286
Total	39,070

Table 25 - The following table represents the number of names subject to multiple requests (i.e. x names were subject to exactly two requests, y names were subject to exactly three requests, etc.) *Note: This section only contains data for the RDNA phase, as this was the only time randomization occurred. It also only contains data for applications that made it to the randomization phase (i.e., it does not contain applications that were not proceeded).*

# Domains	# DNA Randomized	# Domains	# DNA Randomized	# Domains	# DNA Randomized
1567	1	5	82	1	183
1656	2	7	83	1	185
1046	3	5	84	1	186
3231	4	8		1	188
5775	5	9	86	1	191
6001	6	7	87		193
3537	7	4	88	1	199
2310	8	6	89	4	200
	9	6	90	1	201
1362	10	4	91	2	202
1179		3	92	4	203
991	12	5	93	5	204
874	13		94	1	205
719	14	5	95	3	206
674	15	2	96	1	207
605	16	10	97	1	209
512	17	3	98	4	
455	18	7	99	2	212
413	19	5		3	213
375	20	9	101	1	
342	21	5	102		218

	# Domains	# DNA Randomized		# Domains	# DNA Randomized		# Domains	# DNA Randomized
	300	22		6	103		1	
	259	23		6	104		2	
	250	24		7	105		1	222
	231	25		4	106		1	223
	193	26		7	107		1	225
	173	27		8	108		1	227
	158	28		5	109		1	229
		29		4	110		2	239
		30		4	111		2	244
		31		5	112		1	245
	104	32		6	113		2	250
	91	33		4	114		2	253
	87	34		5	115		2	254
	84	35		1	116		1	255
	73	36		5	117		2	256
	78	37		2	118		1	257
	56	38		3	119		1	259
	56	39		5	120		2	262
	62	40		1	121		1	271
	59	41		9	122		1	275
	49	42		2	124		1	280
	41	43		2	126		1	282
	31	44		4	127		2	283
	32	45		3	128		1	287
	37	46		2	129		1	289
	28	47		2	130		1	290
	30	48		2	131		2	291
	24	49		1	133		1	294
	26	50		2	134		1	298
	31	51		2	135		1	306
	23	52		5	136		1	308
	26	53		2	137		1	311
	21	54		3	138		1	341
	22	55		2	139		1	344
	24	56		2	140		1	356
		57		3	141		1	357
	17	58		2	143		1	365
	22	59		1	144		1	371
	22	60		2	145		1	400
	15	61		2	147		1	421
		62		1	149		1	428
	17	63		1	154		1	437
	10	64		4	155		1	445
	7	65		1	157		2	467
	20	66		2	158		1	468
		67		2	160		1	489

# Domains	# DNA Randomized	# Domains	# DNA Randomized	# Domains	# DNA Randomized
14	68	2	161	1	512
10	69	3	163	1	523
12	70	3	164	1	534
9	71	1	165	1	557
	72	1	166	1	563
6	73	3	167	1	642
10	74	2	170	1	817
8	75	2	171	1	1001
2	76	2	172	1	1133
	77	2	174	1	1271
5	79	1	175	1	1522
6	80	1	177	1	2296
6	81	1	181	1	2994

Table 26 – The following tables provide the number of names subject to multiple requests in each submitted by each Registrar queue (i.e. x names were subject to exactly two requests, y names were subject to exactly three requests, etc.) *Note: This section only contains data for the RDNA phase, as this was the only time randomization occurred. It also only contains data for applications that made it to the randomization phase (i.e., it does not contain applications that were not proceeded).*

007 Names, Inc.	
Domains	# Of Applications
2447	1
589	2

1 eName Co	
Domains	# Of Applications
30007	1

123 Registration, Inc.	
Domains	# Of Applications
4061	1
979	2
334	3
148	4
92	5
82	6
47	7

123 Registration, Inc.

Domains # Of Applications

40	8
24	9
22	10
25	11
16	12
17	13
14	14
12	15
6	16
12	17
7	18
8	19
5	20
2	21
2	22
5	23
2	24
4	25
4	26
3	27
2	28
6	29
1	30
2	31
4	32
3	33
5	34
1	37
1	39
2	40
1	44
2	46
2	48
1	49
1	59
1	67
1	75
1	78
1	86
1	110

1stDomain.Net

Domains # Of Applications

7061	1
346	2
146	3

1stDomain.Net	
Domains	# Of Applications
50	4
22	5
15	6
9	7
6	8
2	9
5	10
4	11
1	12
3	13
1	14
1	17
1	19

Abacus America, Inc. d/b/a Names4Ever.com	
Domains	# Of Applications
30516	1
1	2

Alice's Registry, Inc.	
Domains	# Of Applications
140	1

Alldomains.com Inc.	
Domains	# Of Applications
5099	1
33	2

Ascio Technologies, Inc	
Domains	# Of Applications
4063	1
710	2
192	3
76	4
42	5
26	6
19	7
8	8
13	9

Ascio Technologies, Inc

Domains	# Of Applications
18	10
16	11
3	12
4	13
3	14
3	15
2	16
2	17
1	18
3	19
1	20
1	21
1	22
1	23
2	29
1	31
1	59
1	66
1	77
1	79
1	87
1	101

BB Online UK Limited

Domains	# Of Applications
2414	1
7	2
1	3

Blueberry Hill Communications, Inc. (d.b.a. Bluehill.com)

Domains	# Of Applications
4561	1

Bondi, LLC

Domains	# Of Applications
317	1
67	2
27	3
9	4
2	5
1	6

Bondi, LLC	
Domains	# Of Applications
1	8

BookMyName.com	
Domains	# Of Applications
30207	1
466	2
81	3
54	4
20	5
7	6
2	7
1	8

BulkRegister.com, Inc.	
Domains	# Of Applications
30697	1

Catalog.com, Inc.	
Domains	# Of Applications
578	1
21	2
3	3
1	4
1	5
2	6
1	11
1	20

CORE Internet Council of Registrars	
Domains	# Of Applications
2073	1
268	2
71	3
63	4
27	5
17	6
15	7
6	8
30	9

CORE Internet Council of Registrars

Domains	# Of Applications
14	10
2	11
2	12
3	14
1	15
1	16
1	18
1	33

Corporate Domains, Inc.

Domains	# Of Applications
781	1
24	2
3	3
1	4

CSL Computer Service (d.b.a. Joker.com)

Domains	# Of Applications
1864	1
197	2
47	3
21	4
7	5
5	6
8	7
2	8
1	10
1	11
1	14
1	15

Domain Bank, Inc.

Domains	# Of Applications
7348	1

Domain People

Domains	# Of Applications
9775	1
42	2

Domain Pro, Inc

Domains # Of Applications

28 1

Domain Registration Services

Domains # Of Applications

458 1

Domaininfo AB

Domains # Of Applications

399 1

21 2

8 5

2 6

Dotster

Domains # Of Applications

9628 1

EasySpace Ltd.

Domains # Of Applications

797 1

EchoKorea, Inc. d.b.a. DomainRG

Domains # Of Applications

442 1

8 2

1 3

eMarkmonitor, Inc.

Domains # Of Applications

542 1

12 2

eNom, Inc.	
Domains	# Of Applications
7499	1
43	2

Funpeas Media Ventures, LLC	
Domains	# Of Applications
1214	1

Gabia Inc.	
Domains	# Of Applications
	1
327	2
142	3
73	4
39	5
31	6
23	7
12	8
13	9
7	10
11	11
7	12
7	13
7	14
4	15
7	16
7	17
3	18
2	20
4	21
4	23
2	24
1	25
2	26
2	29
2	31
2	32
1	33
1	35
1	36
2	39
2	42
1	52
1	53
1	64
1	72

Gabia Inc.	
Domains	# Of Applications
1	85
1	99
1	120
1	150

Gal Communications Ltd.	
Domains	# Of Applications
3653	1
94	2
23	3
1	4

Global Media Online Inc.	
Domains	# Of Applications
18	1
549	2
80	4
1	5
27	6
5	8
5	10
1	12
1	16
1	18
43	20
1	22
1	24
1	32
2	40
1	50
1	59
1	60
1	100
1	120
2	200
1	290
1	296
1	301
1	999

Hangang Systems, Inc. d/b/a Doregi.com	
Domains	# Of Applications
6253	1

Hangang Systems, Inc. d/b/a Doregi.com

Domains	# Of Applications
52	2
18	3
9	4
4	5
3	6
2	9

I.D.R. Internet Domain Registry, Ltd.

Domains	# Of Applications
2993	1
33	2

IHoldings.com, Inc d/b/a DotRegistrar.com

Domains	# Of Applications
781	1
170	2
998	3
181	4
2875	5
487	6
139	7
68	8
109	9
63	10
48	11
32	12
24	13
21	14
7	
9	16
5	17
5	
6	19
6	20
3	21
3	22
1	24
1	25
1	26
1	46

**Intercosmos Media Group, Inc. d.b.a.
DirectNIC.com**

Domains	# Of Applications
7339	1

Interdomain, S.A.

Domains	# Of Applications
62	1

Internetters Limited

Domains	# Of Applications
746	1

Key-Systems GmbH

Domains	# Of Applications
2385	1

**Melbourne IT d/b/a Internet Names World
Wide**

Domains	# Of Applications
4343	1
886	2
254	3
118	4
234	5
74	6
36	7
21	8
16	9
281	10
86	11
28	12
20	13
10	14
12	15
12	16
4	17
8	18
4	19
66	20
20	21
7	22
5	23

Melbourne IT d/b/a Internet Names World Wide

Domains # Of Applications

3	24
14	25
3	26
4	27
2	28
1	29
8	30
8	31
2	32
2	33
1	34
1	35
2	36
1	37
3	38
3	40
1	41
4	42
1	44
2	45
4	46
2	48
19	50
9	51
2	52
3	53
1	55
1	56
1	58
1	60
1	61
	76
1	80
2	86
1	90
37	100
3	101
4	102
3	103
1	104
1	106
2	107
2	110
2	120
1	123
1	125
1	129
1	135
3	150

Melbourne IT d/b/a Internet Names World Wide

Domains	# Of Applications
1	154
1	157
1	189
15	200
1	201
1	203
1	210
1	241
1	402

Namebay SAM

Domains	# Of Applications
362	1
17	2
1	4
1	5

NameEngine, Inc.

Domains	# Of Applications
1573	1
52	2
4	3

Namescout.com

Domains	# Of Applications
3623	1
113	2
38	3
14	4
7	5
3	6
3	7
2	8
1	14
1	18

Net Searchers International, LTD

Domains	# Of Applications
222	1
2	2

NetBenefit d/b/a NetNames	
Domains	# Of Applications
	1
129	2
4	3
2	4
2	6

Netpia.com, Inc.	
Domains	# Of Applications
484	1
	2
60	3
35	4
87	5
39	6
28	7
17	8
12	9
13	10
14	11
3	12
4	13
1	14
3	15
2	16
3	17
2	20
1	21
1	25
2	26
2	29
1	30
1	31
1	34
	35
1	50
1	52

Network Solutions Inc.	
Domains	# Of Applications
	1

Nominalia Internet SL	
Domains	# Of Applications
296	1
37	2
4	3

Nordnet	
Domains	# Of Applications
157	1
3	2
154	10
5	11
2	20
37	25
2	26
2	30
12	35
4	50

OnlineNIC, Inc. d/b/a China-channel.com	
Domains	# Of Applications
2103	1

Parava Networks, Inc.	
Domains	# Of Applications
3461	1
578	2
199	3
108	4
59	5
29	6
16	7
10	8
6	9
2	10
3	11
1	12

Phillipine Registry.com, Inc.	
Domains	# Of Applications
383	1
44	2
7	3

1	4
2	5
1	6

PSI-Japan, Inc.	
Domains	# Of Applications
326	1

R&K Global Business Services, INC. (000domains.com)	
Domains	# Of Applications
731	1

Register.com	
Domains	# Of Applications
8041	1
2504	2
883	3
374	4
218	5
108	6
73	7
61	8
43	9
26	10
18	11
19	12
18	13
9	14
12	15
2	16
9	17
5	18
4	
8	20
2	21
4	22
1	23
2	24
2	25
7	26
1	27
2	29
	30
1	33
1	34
1	36

Register.com	
Domains	# Of Applications
1	37
1	46
1	
1	50
1	52
1	93
1	110

Registrars Asia PTY LTD	
Domains	# Of Applications
991	1
225	2
79	3
38	4
11	5
1	6
1	7

Registration Technologies, Inc	
Domains	# Of Applications
4318	1

Schlund & Partner	
Domains	# Of Applications
9566	1

Secura GmbH	
Domains	# Of Applications
1770	1
753	2
182	3
69	4
39	5
16	6
15	7
7	8
5	9
1	10
1	11
1	14
	16

Secura GmbH	
Domains	# Of Applications
1	22

Signature Domains	
Domains	# Of Applications
16	1

SiteName.com, LLC	
Domains	# Of Applications
48	1

Tierra Net Inc. DBA Domain Discover	
Domains	# Of Applications
5762	1

TLDs Inc.	
Domains	# Of Applications
2165	1
424	2
124	3
147	
167	5
	6
46	
24	8
11	9
24	10
8	11
16	12
8	13
5	14
13	15
3	16
6	17
3	18
	20
2	21
1	22
1	23
1	24
34	25

TLDs Inc.	
Domains	# Of Applications
1	26
5	30
1	
2	32
1	
1	
1	37
1	40
25	
1	52
1	63
1	68
1	
2	75
1	80
24	100
2	
1	176
6	201
5	252
1	353
5	504
3	1008
2	2017

Total Web Solutions d.b.a. Total Registrations	
Domains	# Of Applications
754	1

Tucows, Inc.	
Domains	# Of Applications
8930	1

Virtual Internet, PLC	
Domains	# Of Applications
1961	1
142	2
6	3
3	4
3	5
1	7

Wooho T&C Co. d/b/a RGNames

Domains # Of Applications

1906	1
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Xin Net Corp

Domains # Of Applications

960	1
2	2

YesNIC Co., Ltd.

Domains # Of Applications

1779	1
601	2
253	3
153	4
90	5
52	6
52	7
31	8
26	9
22	10
20	11
22	12
13	13
8	14
8	15
8	16
3	17
5	18
7	19
6	20
2	21
4	22
2	23
5	24
3	25
3	27
2	28
2	29
2	30
3	31
2	32
4	35
3	36
3	38
1	
1	40

YesNIC Co., Ltd.	
Domains	# Of Applications
1	41
2	42
2	43
1	
1	47
1	48
1	51
1	52
1	
1	54
1	55
1	57
1	66
1	78
1	88
1	144
1	242

Table 27 – The following table presents Registry Live domain name registrations transferred to another holder during each month after the Commencement-of-Service Date

Month	Domains with Registrant Changes
11/2001	55,398
12/2001	15,886
1/2002	10,401
2/2002	10,503
3/2002	48,771
4/2002	26,049
5/2002	26,974
6/2002	7,227
7/2002	7,161
8/2002	9,244
9/2002	8,166
10/2002	12,280
11/2002	2,279
Total	208,717

Table 28 - Types of Marketing by Quarter

Quarter	Type of Marketing
	Tradeshows, websites, collateral
Q2	Online, offline, tradeshows, websites, collateral
Q3	Out-of-home advertising, online, offline, tradeshows, promotion events, websites, collateral
Q4	TV, Out-of-home advertising, online, offline, tradeshows, websites, promotion events

Table 29 - Types of Marketing – Expense Amounts

Media Expenditure	Dollar Amount
Offline domestic	\$2,276,612
Offline international	\$1,493,047
Online domestic	\$507,471
Online international	\$287,079
Out-of-home	
Tradeshaw	\$215,800
Promotional events	\$324,362
TV	\$98,797
Marketing agency fee	\$1,955,397
PR agency fee domestic	
PR agency fee international	\$600,621
Translations (German, Japanese, Chinese, Spanish, Korean, French)	\$156,330
Websites	\$100,674
Research and focus group	\$109,832
Collateral, promotion and educational materials	
Total	\$9,326,587

Table 30 - New employee positions hired during the Pre-Phase 1 Period (Before May 25, 2001):

Job title	Date of hire
Sr. Director	24-Apr-95
Sr. Director, Operations - IT&S	26-Oct-98
Executive Assistant	28-Feb-00
VP, Operations - Europe	22-May-00
CEO & VP Internet Services	2-Jan-01
VP, Finance & Customer Svc	5-Feb-01
Customer Operations Director	12-Feb-01
Product Marketing Director	26-Feb-01
Director, Marketing	18-Apr-01
Registry Relations Manager	23-Apr-01
NOC & Data Center Manager	23-Apr-01
Sr. Settlement/Payment Analyst	30-Apr-01
Account Manager Channel	30-Apr-01
Customer Support Account Manager	7-May-01
Operations Director	7-May-01
Product Management Director	14-May-01
Customer Support Account Manager	21-May-01
VP, Sales	21-May-01

Table 31 - New employee positions hired during Phases 1 and 2 (May 25 to November 7, 2001)

Job title	Date of hire
Business Development Director	29-May-01
Administrative Assistant	29-May-01
Customer Service Account Manager	1-Jun-01

Job title	Date of hire
Sr. Manager, Product Management	4-Jun-01
Manager, Marketing	18-Jun-01
Customer Service Account Manager	18-Jun-01
Channel Marketing Manager	18-Jun-01
Website Execution Manager	6-Aug-01
	13-Aug-01
Product Marketing Director	13-Aug-01
Web Master	20-Aug-01
Operations Manager	20-Aug-01
Product Marketing Director	27-Aug-01
	4-Sep-01
Operations & Process Manager	4-Sep-01
Registry Marketing Manager	10-Sep-01
Financial Planning Manager	24-Sep-01
Sr. Manager	1-Oct-01
	22-Oct-01
Analyst, Technical	5-Nov-01

Table 32 - New employee positions hired after Phase 3 Registry Live

Job Title	Date of Hire
Customer Service Account Manager	19-Nov-01
Account Manager	
Customer Support Account Manager	4-Sep-02

Table 33 – Comparison of .biz registrations to five (5) other TLDs (.com, .net, .org, .de, .co.uk). Based on a random sampling of 100 .biz domains registered as a result of the Phase 2 landrush process before Go-Live

TLD	Number of Duplicate Registrations (based on sample of 100)	Percentage with the same Registrant	Percentage sharing at least one name server
.com	85	42%	33%
	47	31%	19%
.org	34	32%	26%
.de	32	15%	12%
	30	13%	10%

NeuLevel .BIZ Support Request and Complaint Tracking

The following section covers the tracking of all support requests submitted by electronic mail to the NeuLevel Registrar Support Group before, during, and immediately after the launch of .biz. These support requests were submitted by Registrars and also by the general public seeking additional information or further clarification about the .biz launch process.

From May 2001 to August 2002, there were a total of 94,975 email support requests submitted to three NeuLevel Support mailboxes. Of all email requests for support, a significant majority were requests for

information, exchanges through the normal course of business, or messages sent to the email address in error. Of the total number of 94,975 emails submitted to NeuLevel, only 1,578 messages, or 1.66 percent, were determined to be “complaints” from a Registrar or from the general public. The following tables account for those email submissions classified as complaints and capture the emails sent to three (3) separate email addresses established by NeuLevel for the launch of .biz. They are as follows:

- Registrar Signup (used for new Registrar turn-up and information)
- Registrar Support (used for ongoing support to existing Registrars)
- Support (used for end-user requests from the general public)

The date range of May 2001 to August 2002 covers the following three phases:

- Pre-Launch (Phases 1 and 2 -- IP Claims, Registrar Signup, Domain Name Applications)
- Launch (Phase 3 – Ongoing Registrar Support, Certification, Testing, etc.)
- Post-Launch (STOP, 2B, RDNA, and ongoing support to Registrars and the General Public)

Table 34 - Pre-Launch Support Requests (Phases 1 and 2)

Support Category	Description	Number	Percentage of Total
IP Claims (Phase 1)	End User IP Claim Issues & Confusion	441	27.9
	Login Errors		5.6
	Missing Password	217	13.8
	No IP Claim Found	127	8.0
	Registrar Missing Batch File		<1.0
	Batch File Errors	8	<1.0
DNA (Phase 2)	Did Not Receive Proceed/Cancel Email Notice	260	16.48
	End User: Registrar Did Not Submit DNA	56	3.5
	Batch File Rejected for Formatting	13	<1.0
	Update Regarding 2B Domains	8	<1.0

Table 35 - Launch and Post-Launch Support Requests

Support Category	Description	Number	Percentage of Total
Registrar Support	Connectivity Issues to OT&E	56	3.5
	Connectivity Issues to SRS	19	1.3
	Certification Testing Errors	21	1.3
	Reports Not Posted	8	<1.0
	Zone File Not Updated	5	<1.0
	2B Affected Names – No Information	17	1.1
	Inability to Transfer Domains	6	<1.0
	Whois Not Updating Properly	9	<1.0
	Domains Locked by Registry	27	1.71
	Wire Transfer Failed	2	<1.0
STOP	Login Error	11	<1.0
	Difficulty Following Filing Procedures	9	<1.0

Support Category	Description	Number	Percentage of Total
	Filing Window Expired	34	2.34
	Some IP Claims not in Account	13	<1.0
	System Won't Issue STOP Filing Number	6	<1.0
	Mistakenly Filed STOP Case Against Self	37	2.34
	Did Not Receive Password	19	1.2
	Got Wrong Password	7	<1.0
	Dispute Provider Fees Too High	17	1.1
	Unable to Find Information on Registrant	31	1.97
	Insufficient Time to Provide Evidence	5	<1.0
Total A	All "Complaint" Email Messages	1,578	100.0
Total B	All Email Messages Received	94,975	1.66

To summarize, the NeuLevel Registry received 94,975 email messages during the launch of the .biz gTLD, of which 1,578 were deemed to be complaints about service, process, performance or communication. This number of complaints represents 1.66% of the total support emails received during the 16-month period from May 2001 to August 2002. The majority of complaints submitted by end-users was in reference to the pre-launch Phases 1 (IP Claims) and 2 (DNA submission) and were primarily a result of the complexity of the process designed by NeuLevel. The majority of complaints received from Registrars referred to connectivity issues or challenges in the formatting of IP Claim and DNA batch files during the pre-launch phases.