

Telnic's response to Neil Edwards' comments

We write to address the issues raised by Mr. Edwards, CEO of .Mobi, in his public comments and to correct a number of misunderstandings contained therein.

Competition: No overlap between .Mobi and .Tel

The .Tel and .Mobi domains fulfil radically different purposes. The object of a .Mobi domain name is to identify a website that has been optimised or specifically designed by Service or Content Providers to work with the limited display capabilities of mobile phones. By contrast, .Tel's purpose is to offer user-friendly domain names that are associated with registrants and can hold identifiers for the ways in which they can be contacted for communications. To achieve this, .Tel will use NAPTR resource records in innovative ways. Using these records, registrants will publish the identifiers by which they can be reached, directly in the DNS.

The .Tel domain will have no records that explicitly identify registrants' machine addresses, other than those required for its DNS infrastructure. The .Tel domain will use NAPTR records to store *contact information* by registrants. It explicitly will not use A or AAAA resource records to identify a registrant's machines. The .Mobi domain does not use NAPTR records, and depends on A or AAAA records to identify machines holding *content* that is designed to be displayed on mobile phones.

In approving both .Mobi and .Tel ICANN is providing the diversity the marketplace needs and expects.

Sponsorship: .Tel empowers its community

Responding to distinct needs in the marketplace, the .Mobi and .Tel sTLDs are very different in goal and scope. Thus, the requirements for their sponsoring organisations differ markedly. The focus of .Mobi is on content delivered by providers to mobile consumers. Therefore its service and content providers have a natural influence: they are the .Mobi community. In contrast the focus of .Tel is on the way people and companies store their contact information using NAPTR records: these people are our community.

Each sTLD has a responsibility to its community – .Tel is no different. Ensuring that our served community has influence on the policies that are applied in .Tel is very important to us. We have engaged in the same detailed process with ICANN as all other sTLDs (including .Mobi), to ensure that the people who make up our community have a real say in the policies that will be applied. There is publicly available documentation that details the process of policy formation, and the mechanism by which representation of the community is safeguarded.

Fees: .Tel fees in line with other TLDs

.Tel has a different use and a different target market to .Mobi. Thus it should not be surprising that the respective pricing models are not the same. The .Tel Registry fee structure reflects this difference. The .Tel agreement unambiguously specifies a minimum quarterly fee to ICANN, a base fee per registration *plus* a variable element based on registration price. With this variable element, overlooked by Mr. Edwards, at certain price points .Tel will pay higher fees for a registration than .Mobi. Overall, as a percentage of Registry revenue, this fee structure is in line with other TLDs.

Transparency: sTLD process fair and transparent for all

As all sTLD applicants can attest, ICANN has carried out a fair and transparent selection procedure. Any comments otherwise would be groundless. The present .Tel proposal has been under review by ICANN for over two years. It has undergone the same process and been subject to the same strict scrutiny on technical, financial and sponsorship issues as every other sTLD application. It is surprising that anyone would challenge the ICANN procedure after benefiting from that self-same process. ICANN has made its selection openly and has applied the same disclosure policy to everyone.

Yours Sincerely,

K. Mahdavi

CEO, Telnic Ltd