



Amazon Registry Services, Inc. (“ARSI”) submits this supplemental comment in support of the Amendment to the .MOI Registry Agreement, listed by ICANN as “Launch of Registration Authentication Platform for .MOI TLD” (“Amendment”).

The April 28 comment by Ms. Kleiman and Mr. Morris (the “Kleiman/Morris comment”) states concerns based on misunderstandings and conjecture that could easily have been addressed by consulting publicly available documents posted on ICANN’s website. The authors did not approach ARSI nor did they appear to review publicly available documents that would have directly addressed their purported concerns. Instead, the authors used inflammatory language to portray their misunderstandings and conjecture as fact-based argument against an RSEP that ICANN has already concluded does not raise any significant competition, security, or stability issues.

It is false that “[ARSI] wants to adopt a pre-registration gTLD Platform that will provide preferential access to certain registrars, but not to others.” Page 1 of the RSEP request, which ICANN posted in December, states “the customer will select its registrar of choice from among the complete list of MOI-accredited registrars and be directed to that registrar’s site.” Moreover, our April 26 comment (posted 2 days before the Kleiman/Morris comment) emphasizes that “all participating registrars will be listed so customers can select among them.” The Kleiman/Morris contention that ARSI intends to “directly or indirectly show[ing] any preference to provide any special consideration to any registrar with respect to operational access to registry systems” assumes that ARSI will violate contractual provisions relating to registry/registrar separation. We object to such a false and disparaging comment, and incorporate by reference pages 5-6 of our April 26 comment.

It is false – and was demonstrably so when the Kleiman/Morris comment was submitted -- that ARSI’s proposed registry service is “likely a violation” of ARSI’s contractual obligation to “operate the TLD in a transparent manner consistent with general principles of openness and non-discrimination by establishing, publishing and adhering to clear registration policies.” ICANN posted on its TLD Startup page *2 days before the Kleiman/Morris comment was submitted* the details of ARSI’s Limited Registration Periods for .MOI. ARSI is not only abiding by its contractual obligations, but is targeting the first LRP for .MOI at French speakers in Africa, a continent historically underserved by the domain industry, the second LRP at Europe, and the third LRP at North America and the Caribbean. We do not understand how anyone could argue that a TLD allowing persons/companies who are unaffiliated with the registry and/or the registry’s affiliated companies to register domain names is a “closed” TLD under the definition adopted by ICANN itself.

It is false that proposals under the [Registry Services Evaluation Policy](#) are limited to “changes technical in nature” and that the RSEP is a “technical proceeding.” This is clear from the language of the policy itself, which also specifically states that a Registry Operator . . . at any time may decide to ... introduce a new TLD registry service.” Registry Services Evaluation Policy, Sec. 2.1.

For the reasons noted above, it is false that ARSI seeks a “major change to systems, competition, and especially Specifications 9 and 11.” To the contrary, ARSI has followed every step in the RSEP process for what ICANN has determined is a new Registry Service that *does not* pose significant competition, security, or stability issues. ARSI seeks to enhance the consumer experience through innovation and product choice, and is doing so in a way that is demonstrably “open” and not closed.

With best regards,

/s/

Stacey King

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