

## Five Key Takeaways from ICANN 55

The Internet Corporation for Assigned Names and Numbers' (ICANN)'s 55<sup>th</sup> meeting covered a number of topics important to brand owners, future new generic top-level domain (gTLD) applicants and registry operators alike. This Legal Update provides an analysis of the five topics of greatest interest to the intellectual property and registry operator communities from the meeting on March 5–10, 2016, in Marrakech, Morocco.

### 1. ICANN Community Unanimously Approves IANA Stewardship Transition Proposal, Including Plans to Enhance Overall ICANN Accountability

The Cross-Community Working Group on Enhancing ICANN Accountability (CCWG) submitted its [Final Report](#) to its Chartering Organizations several weeks prior to the start of ICANN 55, requesting that these Chartering Organizations provide the CCWG with a final decision during the Marrakech meeting as to whether the organization approves or rejects the recommendations for a number of key improvements to ICANN accountability described in the Final Report. These accountability-related recommendations represent the final element of a conditionally community-approved [proposal](#) to transition US government stewardship and oversight of the Internet Assigned Numbers Authority (IANA) functions to the global multi-stakeholder Internet governance community represented under the ICANN umbrella. This transition represents the final step in a process first

[envisaged](#) at the time ICANN was created in 1998 to fully privatize Internet governance and extricate the US government, or indeed any one government, from having any unique or heightened role in Internet governance.

By the start of ICANN 55, two of the CCWG's six Chartering Organizations had approved the Final Report, namely the Security and Stability Advisory Committee (SSAC) and the Address Supporting Organization (ASO). During the course of ICANN 55, each of the remaining four Chartering Organizations approved the Final Report in turn, including the At-Large Advisory Committee (ALAC) on March 6, and the Governmental Advisory Committee (GAC), Generic Names Supporting Organization (GNSO), and Country-Code Names Supporting Organization (ccNSO) on March 9, 2016. Although some in the community, particularly within the [GNSO](#) and the [GAC](#), continued to hold strong reservations regarding the proposed accountability enhancement framework, the community at both the individual constituency and stakeholder group level as well as the Supporting Organization and Advisory Committee level, overwhelmingly supported the community-driven, bottom-up, multi-stakeholder, consensus-based recommendations reflected in the CCWG Final Report.

After having received approval from all of the Chartering Organizations, the CCWG Co-Chairs transmitted the Final Report and statements of Chartering Organization support to the ICANN Board for its sign-off. On March 10, 2016, the

final day of the ICANN 55 meeting, the ICANN Board unanimously and enthusiastically resolved to transmit to the US National Telecommunications and Information Administration (NTIA) the completed IANA Stewardship Transition Proposal incorporating the final recommendations on enhancing ICANN accountability. Community and Board approval of this proposal represented a historic moment for ICANN.

However, additional work remains to be completed before the IANA Functions can be successfully transitioned in accordance with the community-devised plan. First, the NTIA must complete its review of the community proposal and determine whether it satisfies its criteria for an appropriate IANA stewardship transition, namely that the transition would:

- Support and enhance the multi-stakeholder model;
- Maintain the security, stability, and resiliency of the Internet Domain Name System (DNS);
- Meet the needs and expectations of the global customers and partners of the IANA services; and
- Maintain the openness of the Internet.

These criteria were at the forefront of the development of the IANA stewardship transition proposal and accompanying accountability enhancements, and the community believes that the proposal satisfies these criteria. The NTIA intends to supply its determination within ninety (90) days of the date on which the proposal was transmitted to it by ICANN, or by June 10, 2016. In the meantime, the community together with ICANN and CCWG attorneys is finalizing draft-updated Bylaws language in accordance with the CCWG recommendations and completing other key implementation elements of the IANA transition such as:

- Finalizing Service Level Agreements with Regional Internet Registries who manage Internet Protocol (IP) addresses;

- Developing the organizational documents necessary to formally establish a Post-Transition IANA entity as an affiliate of ICANN that will take over the IANA oversight role from the NTIA; and
- Finalizing a new Root Zone Maintainer Agreement between the Post-Transition IANA entity and Verisign as the maintainer of the authoritative Internet Root Zone.

These and other implementation steps will need to be completed by September 30, 2016, which is when the current IANA Functions contract between the NTIA and ICANN is scheduled to expire. In addition, the US Congress must provide its approval to proceed with the IANA stewardship transition, given its budgetary and appropriations-related authority over the NTIA. Indeed, political opposition to the transition may ultimately prove to be the most difficult hurdle to clear, with many Congressional Republicans expressing doubts as to whether the US should relinquish this final component of control over Internet governance and whether the multi-stakeholder community and ICANN as an organization are mature enough to accept this additional responsibility. Congressional hearings are scheduled to take place intermittently during the spring and summer of 2016, and it will be incumbent upon the ICANN community to assuage any concerns and demonstrate that Congress should not inhibit the IANA transition from moving forward.

Finally, the community is gearing up to move forward on so-called “Work Stream 2” efforts, namely covering a number of further accountability enhancements or refinements to Work Stream 1 mechanisms that may be implemented post-IANA stewardship transition. These Work Stream 2 enhancements that have been identified in preliminary discussions include:

- Improvements to the ICANN Ombudsman role;

- Improvements to ICANN Staff accountability to the community;
- Improvements to ICANN and constituent Supporting Organization and Advisory Committee transparency and accountability to the stakeholders they serve;
- Possible changes to ICANN’s responsibilities regarding “human rights,” including assessing ICANN’s operational impact on human rights issues, legal analysis of its corporate and social responsibility to respect applicable human rights, and the possible development of a framework of interpretation to guide refinements to ICANN’s responsibilities in this area;
- Clarifications to various legal issues, such as ICANN “jurisdiction,” potential conflicts between international law and national law vis-à-vis ICANN decision-making, conflicts between law and ICANN policy, and defining “applicable law” for purposes of ICANN contractual interpretation and enforcement; and
- Improvements to ICANN diversity and linkages to organizational accountability to the global Internet community.

Given that these items need not be implemented prior to the IANA stewardship transition, work on these matters is likely to continue at a less aggressive pace well into the years ahead.

## 2. Voluntary Best Practices Initiatives for Contracted Parties Continue to Coalesce on Matters Beyond ICANN’s Contractual Compliance Remit, Including Trademark Issues and Copyright Concerns

Domain name registry operators and registrars continue efforts to develop voluntary best practices, primarily in the form of the Domain Name Association’s “Healthy Domains Initiative” (HDI), which is aimed at building and maintaining trust in the domain name system, particularly in light of the new gTLD program’s

rapid and exponential expansion of the gTLD marketplace. The initiative is also intended to demonstrate to lawmakers and regulators that the gTLD industry is mature and capable of sensible self-regulation by leading efforts to develop and implement voluntary best practices. Such best practices are intended to create more certainty for “good actor” domain name registrants, as well as others with interests in a healthy and secure domain name system, including the development of largely unprecedented best practices for registry operators in partnering with trusted complainants and handling complaints of intellectual property infringement to suspend, transfer or terminate domain names.

This initiative reflects one of several work streams both within the ICANN community, as well as efforts within the United States government (most notably through the United States Intellectual Property Enforcement Coordinator), to foster more responsible gTLD registry business models and operations, as well as to protect brand owners and enhance consumer protection within the gTLD space. To date HDI efforts have focused more heavily on copyright interests and protecting online content, likely given more active participation by representatives of these industries such as the Motion Picture Association of America.

Notably, these efforts are in large part the result of repeated confirmation by ICANN, including ICANN’s Chief Contract Compliance Officer, Allen Grogan, that certain issues involving, for example, copyright infringement and trademark counterfeiting, are beyond the remit of ICANN contractual compliance given that they involve website content rather than merely issues pertaining to domain names by themselves. Nonetheless, while proactive industry self-regulation is key in promoting good actors in the space and marginalizing bad actors, ICANN Compliance must continue to play a role in such efforts as the primary ICANN contractual interpretation and enforcement organ and given

that the contracts themselves should provide grounding for the best practices.

The HDI is examining four primary categories of best practice concepts, which it has labeled as follows:

- Abuse automation and categorization;
- Third party validators;
- Copyright infringement; and
- Capture bad actors and develop a “reputational database.”

Trademark issues, in particular online counterfeiting, are notably absent from this set of high-level concepts, underscoring the need for increased brand owner engagement in this process to ensure these considerations are more fully taken on board. That said, trademarks appear to be included as a component of the first concept regarding abuse automation and categorization, and “counterfeiting” as a component of the third concept entitled “copyright infringement,” indicating that this category is intended to cover both trademark and copyright issues, although there are clear informational gaps within the registry community that would benefit from additional insight from the brand owner community to ensure copyright and trademark issues are not conflated.

Nonetheless, the HDI is an extremely important initiative, and has already demonstrated that it is much more flexible, adaptable, and in tune with actual practice than the “blunt instrument” of the contractual enforcement. In addition, DNA members stressed that these efforts are intended to include all TLDs and are not limited to new gTLDs or even only gTLDs—indeed, the HDI is open to participation and best practices development applicable to legacy gTLDs, new gTLDs, sponsored TLDs, and ccTLDs. This breadth is encouraging, as many legacy and ccTLDs, in particular, are sources of strong concern with respect to lax practices to address intellectual property infringement and other abuse.

Brand owners and gTLD registry operators should remain up to speed on the HDI, as registry operator representatives and other interested parties continue to develop voluntary best practices, including on procedures for handling complaints of intellectual property infringement and other domain name abuse.

### 3. ICANN Community Kicks Off in Earnest Preparations for Additional New gTLDs, Despite Concerns That Reviews of 2012 Round Are Still Ongoing

A number of distinct but interrelated work streams are ongoing within ICANN to both review the 2012 round of new gTLDs and prepare for additional new gTLDs, including:

- Competition, Consumer Choice and Consumer Trust (CCT) Review;
- Independent Review of the Trademark Clearinghouse (TMCH);
- GNSO Policy Development Process (PDP) to Review All Rights Protection Mechanisms (RPMs) in All gTLDs; and
- The awkwardly named GNSO “PDP on New gTLD Subsequent Procedures,” which essentially covers policies applicable to future gTLDs.

#### COMPETITION, CONSUMER CHOICE AND CONSUMER TRUST (CCT) REVIEW

The Competition, Consumer Choice and Consumer Trust (CCT) Review is a review mandated under the Affirmation of Commitments (AoC) between ICANN and the US government.

The CCT Review Team has recently developed its Work Plan, envisaging an initial determination of key issues, followed by requests for additional data sets, consideration of phase two of both a consumer survey and economic survey currently under way, issuance of initial recommendations by Q2 of 2016 (if any), finalization of findings on each key issue and the publication of a final

report for public comment by Q4 2016, with delivery of final report and recommendations to the Board by the end of Q1 2017. Key issues that have been identified by the CCT Review Team to date include:

- Whether the public can safely navigate to and use new gTLD;
- What the impact of Public Interest Commitments (PICs) has been;
- To what extent there is a risk of confusion and DNS abuse with respect to new gTLD;
- What the extent of awareness of new gTLDs is in developing countries; and
- Whether there are any significant trademark-related issues in connection with new gTLDs.

In addition, the CCT Review Team fielded questions from the GAC, including on the following key subjects:

- Adherence and registry operator best practices applicable to all Public Interest Commitments (PICs), particularly those adopted in reaction to GAC safeguard advice;
- Potential Internet user confusion at the second-level between two-character domain names versus corresponding country codes, as well as similar confusion related to full country and territory names;
- Restrictions and limitations imposed on community-based new gTLD applications, and their impact on consumers within discrete communities; and
- Intersection or overlap between the CCT Review on trademark Rights Protection Mechanisms (RPMs) versus related GNSO policy work to review RPMS.

Certainly, the CCT Review Team is aware of each of these issues and is expected to examine them against a large set of metrics previously devised by an informal working group to develop new gTLD program performance indicators and metrics pertaining to competition, consumer choice, and consumer trust. Ultimately, the CCT Review Team's conclusions will feed into the

New gTLD Subsequent Procedures PDP and are expected to inform deliberations within that group, which is responsible for actually producing recommendations for additional or amended new gTLD policy.

### **INDEPENDENT REVIEW OF THE TRADEMARK CLEARINGHOUSE (TMCH)**

The TMCH Independent Review (a review that will be conducted by a consultant hired by ICANN, rather than members of the community), is an additional review requested by the GAC to provide an opportunity to address potential concerns regarding perceived limitations to the TMCH systems. The Review is expected to focus on both:

- Possible expansion of the TMCH to provide services involving non-exact matches to recorded trademarks, including an assessment of whether domain names that include a mark at the beginning or the end of an applied for second level domain could be included in the services, and whether the automated system should be enhanced to include key terms associated with the goods or services identified by the mark, and typographical variations identified by the rights holder; and
- Possible extension of claims services beyond the mandatory minimum ninety (90) calendar days currently required by ICANN and offered by the vast majority of new gTLD registry operators, including an assessment of the benefits of extending claims service beyond 90 days. In this vein, it will also focus on the impact of the claims service and notifications of registered names on the commercial domain name watch service market, and the likely resource requirements for extending claims service for the entire life of each new gTLD registry.

The review will focus on three key aspects of the TMCH, namely:

- (1) The matching criteria used to determine which domain names are relevant to the

claims service and sunrise registration periods;

- (2) The trademark protection provided by the claims service; and
- (3) The trademark protection provided by the sunrise registration period.

In evaluating these elements of the TMCH and supported services, the consultant plans to conduct its own internal empirical analysis, as well as to collect stakeholder views (potentially through surveys and/or interviews) to further inform the study with qualitative information. Of course, the latter raises some concerns that the consultant may inadvertently exclude or under-represent certain stakeholder views through its data gathering methodology.

The analysis has been framed as focusing on the costs and benefits of expanding trademark matching rules of the TMCH to include non-exact matches, including through an analysis of a sample set of TMCH-recorded marks and examining whether this mark is registered at the second level in .COM and other gTLDs, who the registrant is (whether the trademark owner or another party), and then quantifying the percentage of string variations that are registered by the trademark holder, another registrant, or not registered at all, as well as the extent to which non-exact variations of a recorded mark have been subject to disputes.

Regarding the Trademark Claims service, the consultant intends to examine TMCH data to determine how often notifications result in registrations being abandoned, registrations being completed but disputed, or registrations being completed and not disputed. By examining the percentage of exact and non-exact strings that fall into the above categories, the consultant hopes to be able to estimate the current benefit to trademark holders of the Claims service and approximate what the benefit will be for various types of non-exact strings.

Regarding the Sunrise service, the consultant hopes to determine how often trademark holders use the Sunrise period relative to general registration and whether that varies across different groups of trademark holders, i.e., type of organization and industry. The consultant plans to review the number of Sunrise versus general registrations made for a particular sample of TMCH-recorded trademark owners. The evaluation seems to conclude that if a significant amount of registrations by trademark holders are made during the Sunrise period, this would be an indication that trademark holders value the opportunity to have priority registration. However, the consultant should be cautioned that if it finds to the contrary, factors such as Sunrise pricing meant to specifically extort or prevent trademark owners from registering domain names during Sunrise should be taken into account. Although the consultant assuaged community concerns on this point, noting that it would obtain feedback from surveyed brand owners as to why they were not participating in Sunrise, the study is not intended to be systemic.

The consultant has also been asked to examine access to and use of the Trademark Database (TMDB), inasmuch as it is unclear whether bad faith registry operators have leveraged the data, in violation of the TMDB Terms of Service, to target brand owners with predatory launch programs. Conversely, the examination should also address the ability of good faith registry operators to prescreen TMDB records from premium and reserved names lists, as well as other marketing programs.

The TMCH Independent Review is sure to produce a body of recommendations for improving the TMCH, including potentially the TMCH-supported Sunrise and claims services, with a direct impact on brand owners and their ability to effectively protect and enforce their rights in the domain name system.

Indeed, there are certainly brand protection benefits to expanding the TMCH to include non-exact match capabilities as well as extended claims services, although extended claims services may place a financial and operational burden on new gTLD registries—including .Brand registries—that is ultimately unwarranted in view of diminishing returns on the service over time. Further, it is unclear how this input will be reconciled with any potentially inconsistent recommendations produced by a forthcoming additional PDP to Review All Rights Protection Mechanisms in All gTLDs, which will include the TMCH within its scope as well. And it is equally unclear whether future iterations of the TMCH and Trademark Database will either permit, or explicitly require screening of registry premium and reserved names against marks entered into the TMCH. Presumably, as part of the policy-development work stream, the RPM Review PDP Working Group will receive the TMCH Independent Review results, consider that as input for its deliberations on the TMCH and ultimately decide whether and how to incorporate that input into its own recommendations, which will be taken up as part of developing policy and implementation tweaks applicable to future new gTLDs.

The consultant recently published a [questionnaire](#) seeking community feedback on these issues, which we strongly encourage brand owners to participate in. We have prepared model responses to the questionnaire, and would be happy to share these with you at your request.

#### **PDP TO REVIEW ALL RPMS IN ALL GTLDS**

On the ground in Marrakech, the GNSO Council approved the Charter of the PDP Working Group to Review All RPMS in All gTLDs, which provides that the new gTLD RPMS will be reviewed first, followed by a review of the UDRP only after the Council votes on the Working Group recommendations from the first phase. The Working Group held its first teleconference on April 21, 2016 and remains in early

organizational stages. However, this PDP will certainly be critical for brand owners in providing an opportunity to evaluate current new gTLD RPMS and propose improvements, including on the URS which has been underwhelming given its lack of transfer remedy and high “clear and convincing” standard of proof. Potential improvement would also cover the TMCH and its validation and matching rules and Sunrise and Trademark Claims services, including advance launch notice to brand owners and extended duration requirements.

While this PDP is just kicking off, we anticipate significant participation by intellectual property owners seeking to obtain tweaks and improvements to the various new gTLD RPMS, and we expect to devote a great deal of attention to this PDP over the course of the coming year. In addition, brand owners should be prepared to defend against attempts to dilute current new gTLD RPMS by non-commercial and domain investor stakeholders. Indeed, the leadership team of the Working Group is comprised of a domain investor community representative, a non-commercial users’ representative, and a business and intellectual property representative.

#### **POLICY DEVELOPMENT FOR FUTURE GTLDS**

The awkwardly named PDP Working Group on New gTLD Subsequent Procedures is tasked with reviewing and offering potential policy refinements to every aspect of the new gTLD program, including: overall process, support, and outreach issues (including application processes, evaluation mechanisms, fees, and possible different tracks for different gTLD types such as .Brand or geographic TLDs); legal and regulatory issues (including reserved names lists, base registry agreement, contractual compliance, defining “public interest” for purposes of Public Interest Commitments and other obligations, and “closed generic” TLDs); string contention, objections and disputes (including string similarity evaluations, objection procedures, appeal and accountability

mechanisms, and community application evaluation issues); Internationalized Domain Names; and technical and operations issues (including security and stability evaluations, technical and financial capability evaluations, and name collision issues). The Working Group is being co-chaired by a representative of the Registry Stakeholders Group, the Non-Commercial Stakeholders Group, and the Business Constituency. Again, the Working Group remains in fairly early stages, currently focusing on reviewing the 2007 GNSO policy recommendations underpinning the new gTLD program and flagging for future discussion areas that may require additional discussion and possible policy changes.

In parallel with this GNSO-led policy work, the GAC also continues to focus on new gTLD-related issues, including in particular, implementation of its advice pertaining to new gTLD safeguards first set forth in its Beijing Communiqué in April 2013. In particular, GAC members continue to highlight areas where they feel the Board has not appropriately implemented its advice, including with respect to strings identified by the GAC as being “highly sensitive” because of potential consumer safety issues and/or their relation to highly-regulated industries such as healthcare and banking. Throughout ICANN 55, GAC representatives were urged to make their opinions heard on all policy matters impacting future new gTLD rounds by channeling views to the CCT Review Team (notably, the GAC has an appointed member of that Review Team representing the US Federal Trade Commission, which also participates as a member of the GAC Public Safety Working Group) and/or the PDP on New gTLD Subsequent Procedures.

Nonetheless, in its [Marrakech Communiqué](#), the GAC flagged existing gTLD Safeguards for future GAC work to maintain and improve, and encouraged the GNSO and At Large Advisory Committee (ALAC) to review Public Interest Commitments (PICs) for strings corresponding

to highly regulated sectors. The GAC also identified experiences with community applications for new gTLDs and the Community Priority Evaluation (CPE) process in the current round as an area of future research and a topic on which it intends to contribute to the PDP on New gTLD Subsequent Procedures and CCT Review Team. In addition, the GAC cautioned the Board and community about proceeding too quickly in preparing for future new gTLDs before concluding necessary reviews of the 2012 round. Regardless, reviews and preparations for future new gTLDs will likely continue to be carried out in parallel over the course of coming years.

#### 4. ICANN Community Begins Highly Contentious Process Likely to Replace WHOIS with Next-Generation Registration Directory Service

The PDP Working Group on Next-Generation Registration Directory Service (RDS) to Replace WHOIS is tasked with analyzing the purpose of collecting, maintaining and providing access to gTLD registration data and considering safeguards for protecting that data, determining if and why a next-generation Registration Directory Service (RDS) is needed to replace WHOIS, creating policies and coexistence and implementation guidance to meet those needs, and providing the GNSO Council with recommendations regarding these issues.

Contracted parties are clearly uncomfortable with the prospect of having to implement a new RDS, which would require extensive contract amendments and costs to implement policy changes, with registrar representatives in Marrakech underscoring that the first task of the Working Group must be to decide if a new RDS is needed, and only if the community agrees that a new RDS is needed—meaning that it has agreed that current WHOIS, or even WHOIS with significant overhauls would be unsatisfactory—would it then consider an entirely new RDS paradigm. On the other side,

members of the IPC and others framed the purpose of the PDP as creating a new RDS, presupposing that the answer as to whether one is needed is “yes.” Again, these divergences in views are unsurprising, given that the IPC has long sought to improve WHOIS data accuracy and access for purposes of enforcing intellectual property rights, while contracted parties have historically been aligned with privacy advocates in this space, prioritizing customer privacy and avoidance of secondary liability based on customer uses of domains. Indeed, members of the Working Group representing privacy and data protection interest have already proposed prioritizing legal review of RDS data elements and data retention requirements to ensure consistency with national privacy and data protection laws; others in the group have proposed prioritizing generating a complete set of possible RDS data elements first, then discussing which elements should ultimately be implemented as part of a next-generation RDS, potentially with variances according to specific users and purposes.

Ultimately, although the precise order of work remains in flux, the Working Group will address privacy requirements, as well as requirements regarding appropriate users and purposes of gTLD registration data, appropriate data elements, and data accuracy. And although relatively quiet to date, brand owners are ultimately expected to participate more heavily to ensure that registration data remains available for purposes of enforcing intellectual property rights against cybersquatters and others engaged in abuse of intellectual property rights in the Domain Name System. We anticipate a very contentious PDP once discussions move from organizational matters into actual substance. In the meantime, the Working Group continues to review and digest historical material on these issues to inform further discussions.

## 5. Registry Agreement Negotiations Draw Nearer to Completion

The new gTLD Registry Agreement provides both ICANN and the Registry Stakeholder Group (RySG) with the ability to discuss revisions through good faith negotiations once every twelve months beginning on July 1, 2014. See Registry Agreement, Article 7.7 (Jan. 9, 2014). Having triggered such negotiations nearly two years ago, ICANN and the RySG finally appear poised to publish mutually agreed upon revisions for public comment for no less than thirty (30) days. While the vast majority of amendments are innocuous, or merely for clarity sake, two in particular should resonate strongly among .Brand TLD registry operators.

First, in the absence of any firm deadline to respond to Centralized Zone Data Access (CZDA) requests, ICANN has insisted upon the insertion of a twenty-one (21) calendar day deadline. While this amount of time is an improvement from their initial insistence on a fourteen (14) day deadline, it is much less than the sixty (60) day standard that several registry operators currently employ. The problem is that CZDA access should be granted only for lawful purposes, and requests must comport with specific credentialing requirements, which can constitute fact intensive analyses that do not scale, particularly in the aggregate for hundreds of requests, to a mere twenty-one (21) calendar day review.

Second, ICANN has offered redlines that would necessitate approval from .Brand TLD registry operators in order to effectuate any future proposed amendments within Specification Thirteen. These amendments were offered in response to concerns from .Brand TLD registry operators that any majority vote within the RySG could essentially force undesirable changes to Specification Thirteen upon them, particularly since they hold only a small minority of votes within the RySG. The problem with the redlines offered by ICANN is that they

include an ultimate veto power for the RySG to object to essentially any and all changes made within Specification Thirteen. While this veto power is justified in a limited fashion, and arguably already accounted for, based on existing ICANN obligations towards equitable treatment among all similarly situated registry operators, the proposed redlines remain unduly broad.

Registry operators, particularly .Brand TLD registry operators, are well advised to participate in the forthcoming public comment period and comment on both matters, because public comments will undoubtedly inform the final round of discussions between ICANN and the RySG.

We look forward to continuing to provide you with key updates on ICANN matters as we approach the next ICANN Meeting, in Helsinki, Finland, on June 27-30, 2016.

Supreme Court and appellate matters; employment and benefits; environmental; financial services regulatory & enforcement; government and global trade; intellectual property; real estate; tax; restructuring, bankruptcy and insolvency; and wealth management.

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