



February 9, 2007

Dr. Paul Twomey  
President and CEO  
ICANN

VIA Email

**Regarding: PIR Comments on the Santa Monica Regional Gathering**

Dear Paul,

I read with interest David Maher's letter of 7 February 2007 regarding Registrar comments at the recent Santa Monica Regional Gathering. I believe he has unfortunately misrepresented Registrar concerns regarding Stacy's presentation.

David is correct in that I and other Registrars had many questions and concerns regarding her presentation. However, I would like to clarify those concerns as I understood them. Stacy stated that ICANN received approximately 10,000 complaints regarding Registrars during 2006. However, that raised some important questions based on the following facts:

- According to the monthly reports for COM/NET alone almost 21 billion write transactions took place Jan-Oct of 2006 (in just 10 months). During that same time frame the COM/NET registry had a net increase in registered names of 13.5 million, and a net increase in accredited Registrars of 300 (from 500 to 800).
- Those billions of transactions and millions of registered names represent the requests of millions of registrants. Even if we conservatively estimate the number of registrants represented by these transactions at 5 million, the 10,000 complaints represents only two tenths of a percent of those registrants. And again, this is only including COM/NET. No doubt, some of those complaints were in regards to other TLDs.
- If those complaints represented issues with individual transactions then the percentage of complaints to transactions is almost imperceptible – less than 5 one-hundred thousandths of a percent!
- Stacy was not able to present any metrics in regards to the 10,000 complaints. For example, what percentage of the complaints had to do with compliance issues, what percentage had to do with actual customer services issues, what percentage had to do with complaints that were the result of the registrar just following required policy, etc?

The fact is that Registrars are not, as David suggests, hostile to compliance. Many of us have repeatedly asked for better compliance procedures and enforcement, and welcome the addition of Stacy to ICANN's staff. We look forward to an improved compliance program.

The concerns raised by Registrars regarding Stacy's presentation are far from indicative of a race to the bottom in service standards. The concerns are indicative of a desire to fully understand all of the facts in regards to the registrant complaints that ICANN receives, with the goal of being sure that any resultant policy or compliance program is appropriate and effective. That cannot be done without framing the situation in actual facts and accurate metrics.

I hope this helps to clarify the intent of the questions and concerns I and others raised during Stacy's presentation.

Sincerely,

Tim Ruiz  
Vice President  
Corporate Development & Policy  
GoDaddy.com

Cc: Kurt Pritz, Senior Vice President, Services  
Craig Schwartz, Chief gTLD Registry Liaison  
Patrick Jones, Registry Liaison Manager  
Stacy Burnette, Director, Contractual Compliance  
Tim Cole, Chief Registrar Liaison