



29 April 2006

Dr. Paul Twomey
ICANN
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

CC:

Ameet Shah, Chairman
GSM Association

Raghu Murhti, Director
Microsoft

Christian Salbaing, Director
Hutchinson Europe

Ritva Siren, Director
Nokia

Reinhard Kreft, Director
Vodafone

Jerry Easom, Director
Syniverse

Dong Jin Koh, Director
Samsung

Olle Aberg, Director
Ericsson

Khalid Bischara, Director
Orascom

Dipchand Nishar, Director
Google

Roberto Vannini, Director
Telecom Italia

Lius Jorge Romero, Director
Telefonica Moviles Espana

Normen Kowalewski,
Director
T-Mobile International

John Jeffries
ICANN

Dear Paul:

The companies and associations sponsoring mTLD Top Level Domain, LLC (dotMobi) have many concerns about the proposed agreement for dottle. I have been requested to officially notify ICANN on behalf of the sponsoring community behind dotMobi. This letter summarizes the concerns of the community and suggests next actions that ICANN may want to consider for fixing the situation.

Background

dotMobi has a well established sponsoring community of mobile and telecommunications companies including investors such as Nokia, Vodafone, Microsoft, T-Mobile, Google, Telefonica, Telecom Italia, GSM Association, Orascom, Syniverse, 3 Hutchinson, Samsung, and Ericsson. We have public support from CTIA, Mobile Marketing Association, Mobile Entertainment Forum, Rural Cellular Association, and the Canadian Wireless and Telecommunications Association.

dotMobi was awarded the .mobi sponsored top level domain in July 2005 after five years of work through a transparent and open process with ICANN. The dotMobi service is scheduled for launch in May for the sunrise trademark period and September for open registrations.

10 / 11 Exchange Place • IFSC • Dublin, 1 • Ireland
+ 353.1.854.1100 (Ph) • + 353.1.791.8569 (Fx)



Concerns

We have the following concerns regarding the proposed agreement for dottle:

1. Sponsoring Community

No sponsoring community for dottle has been publicly disclosed in their application or proposed agreement. The original dotMobi application was turned down when Nokia submitted the first application years ago. dotMobi expanded the sponsoring community to include a broad and diverse representation of companies and associations with a global footprint. Why has dottle not been held to the same standard of community sponsorship that dotMobi had to produce? dotMobi wants to understand why this important part of the process has not been more transparent. dotMobi wants to understand why we had to prove a higher level of sponsorship when dottle appears to have no sponsors.

2. Price and Fair Competition

Dottle competes directly with many of the services that dotMobi provides or plans to provide in the future. dotMobi's application has been public record since the publication of our original application. dotMobi has two direct concerns about the dottle proposed agreement.

a. Price

The dottle agreement proposes \$0.15 per domain while the dotMobi agreement charges \$0.75 per domain. dotMobi has a natural disadvantage to the proposed dottle price while we offer similar services. dotMobi requests for ICANN to provide a fee structure on an equal basis to what has been proposed to dottle.

b. Fair Competition

The dottle agreement is the first time that ICANN proposed to launch two competing sponsored top level domains within a similar time period. The dotMobi sponsored top level domain has a global supporting constituency while dottle has no public supporting constituency. Both sponsored top level domains offer similar services, but dottle has been provided with a price advantage. Dottle also had to follow a less transparent process and pass a much lower level of justification than dotMobi. dotMobi requests that ICANN require dottle to follow the same level of transparency and justification that dotMobi had to follow.

Next Steps

dotMobi looks forward to hearing back from ICANN on these key points. We request that the dottle proposed contract undergo a further review. Dottle must live up to the same standards that ICANN required of dotMobi and other sponsored top level domains for sponsorship. We formally request that ICANN change the pricing in the dotMobi agreement to \$0.15. We formally request that the dottle agreement not be approved at the present time.

We look forward to working with ICANN on this endeavor.

10 / 11 Exchange Place • IFSC • Dublin, 1 • Ireland
+ 353.1.854.1100 (Ph) • + 353.1.791.8569 (Fx)



Internet Made Mobile

Regards,

A handwritten signature in black ink, appearing to read "Neil Edwards".

Neil Edwards
CEO, dotMobi