



Richard Tindal
Vice President, Registry Services
+1-571-434-5784 (phone)
+1-571-434-5735 (fax)

www.neulevel.biz

NeuLevel, Inc.
Loudoun Tech Center
46000 Center Oak Plaza
Sterling, VA 20166 USA

Richard.Tindal@neulevel.biz

November 01, 2004

Dr. Paul Twomey
CEO
ICANN
4676 Admiralty Way, Suite 330
Marina del Ray, CA 90292

Dear Paul:

We have noticed a number of letters addressed to you endorsing VeriSign as the operator of the .NET Registry. Typically these letters are from corporations with whom VeriSign has joint business interests. Many appear to be form letters.

We do not believe such endorsements should be considered in the .NET evaluation process. Although we believe that references submitted by the applicants are appropriate to demonstrate a registry's capabilities, we do not believe that "endorsements" are valid measures of an operator's detailed technical performance.

Historically, ICANN has accepted endorsement letters, however, these were used for sponsored TLDs, which were required to represent a particular community. Endorsements were also used for the .ORG reassignment because the registry operator selected in that process was required, by the criteria, to represent the not-for-profit community. Unlike those procurements, .NET does not represent a specific user group but rather the Internet community at large. In addition, there has been no suggested criteria by the GNSO that would require such endorsements.

If, however, ICANN decides that endorsements as opposed to references of capabilities are required, then please accept our strong recommendation that the endorser reveal the complete extent of its commercial interests with the party being endorsed. We feel this will give evaluators a better basis for objectively assessing such endorsements.

Yours sincerely,

Richard Tindal
Vice President, Registry Services