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COMMITTEE

Legal Affairs Department

Ref. No. DSC/2015/HMS  
By mail

Dr Steven Crocker  
Board of Directors, Chair  
Internet Corporation for Assigned  
Names and Numbers  
12025 Waterfront Drive  
Suite 300  
Los Angeles, CA 90094-2536

Lausanne, 17 September 2015

**ICANN Independent Review Proceeding: 01-14-0001-6263**

(Donuts, Inc. v ICANN)

Dear Dr. Crocker:

The International Olympic Committee (IOC) respectfully submits this letter to ICANN, in connection with the pending Independent Review Proceeding, to offer its support for SportAccord and World Rugby. The IOC has already submitted correspondence to ICANN responding to other disgruntled applicants who have sought to undermine and delay the decision in favor of SportAccord's community application for .Sport.<sup>1</sup>

As the supreme authority and leader of the Olympic Movement, the IOC believes that it is important to have its voice heard on this matter, as it encourages cooperation among all members of the Olympic sporting community, including the International Sports Federations. Under the Olympic Charter, the IOC, among other things, is charged with encouraging and supporting the organization, development and coordination of sport and sports competitions.

Contrary to the assertions made by Donuts, the IOC has not withdrawn financial or other support for SportAccord. SportAccord continues to play a vital role in the international sports community. It represents over a hundred sporting federations. Its mission continues and it has the full support of the IOC.

Donuts' attempt to portray SportAccord negatively is inaccurate and misleading. Moreover, it misses the main point: SportAccord is in a far better position to represent the sporting community than Donuts, which has applied for a multiplicity of completely unrelated generic Top Level Domains, in addition to .Sport, on subjects with which it has no prior experience, and in which it does not appear to have a genuine interest, other than a desire to profit commercially.

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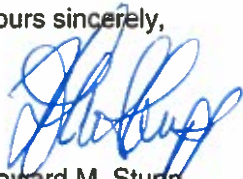
<sup>1</sup> See IOC letter in connection with dot Sport Limited LLC, <https://www.icann.org/en/system/files/files/stupp-to-bqc-30apr14-en.pdf>

ICANN rightly determined that SportAccord is better situated to represent the sporting community than a commercial interest. Yet SportAccord's application for .SPORT has been placed on hold, to the detriment of the sporting community, pending the resolution of this Independent Review Proceeding instituted by Donuts. The potential abuse of the IRP and other accountability mechanisms by third parties advancing their commercial interests over distinct and recognized communities is a concern that has been raised not only by other applicants but also ICANN's Government Advisory Committee (GAC).

The IOC remains steadfast in its support of SportAccord, and trusts that this proceeding will be brought to a swift and appropriate conclusion.

Should ICANN or the IRP panel have any additional comments, please do not hesitate to contact the undersigned or our outside counsel James Bikoff directly.

Yours sincerely,



Howard M. Stupp  
Director of Legal Affairs

cc: James L. Bikoff (JBikoff@sgrlaw.com)