I. Start-up Phase Policies

During the start-up phase of the expanded usTLD, NeuStar will establish a set of important policies designed to improve and maintain the integrity of the usTLD by protecting important intellectual property rights and ensuring that the usTLD serves the U.S. Internet community.

During the expansion of the usTLD, the new administrator will face a number of serious issues similar to those encountered by new gTLDs. These issues include, for example, concerns regarding cybersquatting, the expected “rush” of registrations at the opening of the expanded TLD space, and the need to enforce registration restrictions such as the requirement in the usTLD that registrants be residents of the US. The absence of well structured plans to address such issues indicates a likely inability of the would be administrator to handle the complex process of opening to the public a new TLD space such as the expanded usTLD, and threatens the integrity and ultimately the success of the usTLD. NeuStar has a strong understanding of these issues and has designed start-up policies and procedures to ensure that the integrity of the usTLD is maintained and improved during the critical start-up phases of the expanded usTLD.

NeuStar will implement the following policies and procedures relevant to the start-up phases of the expanded usTLD:

• **Sunrise Policy** – NeuStar will implement a sunrise policy to allow trademark holders and applicants to register their valuable marks in the usTLD prior to the expanded usTLD being opened to the general public. This process is modeled after the sunrise policies adopted by some of the new ICANN sponsored gTLDs. The sunrise policy is discussed in detail in Section B.3.3 of this proposal.

• **usTLD Dispute Resolution Policy (usDRP)** – NeuStar understands that to ensure that the usTLD serves the usTLD community fairly and with a high degree of integrity, strong dispute resolution procedures must be implemented to address concerns and issues under the administrator’s policies. Following on the significant work by ICANN, NeuStar has developed effective, efficient, and fair dispute mechanisms for the usTLD. The usTLD dispute resolution policies are discussed in detail in Section B.3.3 of this proposal.

• **US Nexus Requirement** – NeuStar will establish a mechanism to ensure that the usTLD serves the US Internet community. Registrants will be required to show that they are either residents in the US or have a bona fide presence in the US. The US Nexus Requirement is discussed in detail in Section B.3.1 of this proposal.

• **Land Rush Process** – NeuStar’s Land Rush process will ensure that the initial “rush” for name registrations for valuable second level domains expected when the expanded usTLD is opened for public registration does not overload our system. The US Nexus Requirement is discussed in detail in Section J of this proposal.

Exhibit I-1 illustrates NeuStar’s carefully phased and controlled start-up process.

NeuStar’s policy approach is thorough and fair, yet is not heavy-handed. The start-up policies outlined herein are the minimum policies required for a secure and stable start-up of the
expanded usTLD. In major part, policy in the usTLD will be developed in collaboration with the usTLD community at large.

Exhibit I-1. The NeuStar start-up process comprises a carefully phased and controlled introduction of the expanded usTLD to ensure the integrity and stability of the usTLD and the Internet.