B.1.1 Accountability Framework for Robust, Certain and Reliable DNS

NeuStar's procedures and policies provide an accountability framework that supports a more robust, certain and reliable DNS.

Since 2001, NeuStar has overseen the steady and responsible expansion of the domain while ensuring long-term integrity. A key component of our successful management of the usTLD during this time has been the development, implementation, and enforcement of unique policies and procedures that support a most robust, certain, and reliable DNS.

NeuStar has worked closely with the U.S. Department of Commerce to develop a framework for the management of the usTLD including the following four segments of the usTLD space:

- **Legacy hierarchical locality space:** NeuStar has identified over 17,000 locality names and 1,500 delegated managers and we continue to work diligently to bring clarity, order, and contractual compliance to this complex space.

- **Expanded second-level space:** In order to successfully and responsibly launch second-level registrations, NeuStar developed and implemented policies and procedures to ensure protection of intellectual property rights, equal access to registrars and potential registrants, accuracy of WHOIS contact data, and the stability, security, and reliability of the DNS.

- **Kids.us:** NeuStar developed and implemented the policies and procedures listed below that support a more robust, certain and reliable kids.us experience. During the last four years, NeuStar has administered the kids.us domain and the content review system that ensures a safe online environment devoid of harmful material. Our enforcement of these key policies has directly contributed to the safety and reliability of the kids.us domain.

- **Reserved Names:** NeuStar acts as the registrar for all reserved name registrations, processing registrations, modifications to registrations, deletions and registration renewals through a form-based registration and certification process.

Not only are usTLD users accountable to NeuStar for following the unique policies of the usTLD, we are accountable to the users for enforcing all of the policies and for providing them with a centralized technical solution that increases the security, stability and functionality of the usTLD.

This includes:

- Geographically diverse, redundant data centers;

- A "thick" data reliable SRS;

- A publicly accessible, accurate and up-to-date registration WHOIS database of Delegated Managers, Locality Registrants, expanded space registrants, and kids.us registrants;

- Data escrow for usTLD zone file and domain name registration information;

- A standard's compliant registry system; and

- A responsive and skilled customer support program to ensure the satisfaction of usTLD users.

B.1.2   Increased Usage of usTLD

NeuStar will promote increased usage of the usTLD, including kids.us, through the introduction of enhanced technology and other services, the dissemination of information, and improving registration and customer support. This will be done in a manner that also ensures the continued quality of the space in accordance with all required policies and restrictions.

NeuStar delivers exceptional service in meeting the technical and operational requirements of the usTLD. One of our primary goals has been to promote increased usage of the space and to develop the space in such a way that ensures that it is a preferred option for members of the American Internet community. Unlike many other TLDs, NeuStar manages the usTLD in a manner that ensures the quality of the space, which has resulted in a brand identity based in reliability and integrity. NeuStar is dedicated to enhancing the usTLD space to encourage increased usage and we are proud of the accomplishments we have made during the term of the current contract.

- We have grown the usTLD from a manually managed set of locality zones to a centrally managed SRS that currently has over 1.2 million second level names and a small but growing number of kids' registrations.

- Usage has grown from about 300 million DNS queries to over 9 billion.

Over the years, in addition to the technical and operational activities NeuStar implemented a variety of product initiatives and promotional, sales, and marketing programs to grow both the second-level usTLD and kids.us volumes, increase visibility, and build usage. These activities, discussed in more detail in Proposal Section B, Subsection C. 3.2.viii, have proven successful and the usTLD space continues to show growth and increased usage.

B.1.3 Centrally Administered Structure for Confidence and Stability

NeuStar operates a centrally administered and efficiently managed structure that ensures registrant (consumer) confidence

When NeuStar assumed responsibility for the usTLD space in 2001, the key elements of a centrally administered system did not exist. We created a centralized database and registration model that included registrars. The result was a highly efficient Shared Registry System (SRS) in which all non-locality registrations were submitted through accredited registrars, using an established and well-defined Extensible Provisioning Protocol (EPP).

NeuStar's thick-data model stores all data in a central database and offers a number of benefits including:

- The creation of a centralized WHOIS service;
- The ability to effectively enforce registration policies; and
- Greatly improved data accuracy.

NeuStar's centralized registry system is not only an integral part of the expanded space, it is central to the modernization of the locality space. Our SRS and WHOIS now contains data on all Delegated Managers, as well as domains for which NeuStar operates as the Delegated Manager.

B.1.4. A Stable and Flexible usTLD Environment

NeuStar operates a stable and flexible usTLD environment that advances and encourages innovation and that will meet the future demands of potential registrants.

Because we are unable to predict with absolute certainty the future needs and demands of potential registrants, NeuStar has designed, built and currently operates a usTLD registry architected with stability for today and flexibility for the future. Our systems meet or exceed all current requirements and demand from our usTLD customers, but we have the capability to quickly, efficiently and affordably expand our operating capacity. Through this design, NeuStar can rapidly adjust to meet new requirements as they are defined. The usTLD environment we have created during the present contract term is well-suited to the challenge of the dynamic Internet environment. The foundation for future growth of the space has been laid, and we look forward to supporting its growth and maturation.

Many of the core features of our usTLD system are conducive to innovation and advancement within the space, but just as importantly, they are architected for stability and reliability. Key elements include:

- Administrator-Registrar Model
- Thick data model
- Standards-based provisioning protocol
- Standards-based implementations
- Operational consistency

- IDN-capable
- IPv6-capable
- Robust Security
- Policy Enforcement
- Directory Services

NeuStar will continue to operate a highly stable and flexible usTLD environment that can be leveraged to take advantage of new opportunities and growth.

B.1.5 Ensuring the stability of usTLD and DNS

NeuStar's experience with the operations of usTLD best qualifies us to ensure the continued stability of the entire DNS and usTLD. As an experienced TLD registry operator, NeuStar has broad and deep experience managing the TLD infrastructure, operations and processes.

Transitioning any established TLD to a new operator involves risk that could negatively impact the stability of the space. With over 1.26 million domains in the usTLD space, millions of websites, including those of many City, County, and State Governments, rely upon the reliability and integrity of the usTLD Administrator and its systems. The usTLD has been well managed over the past six years; NeuStar has consistently met service level requirements, enforced all registration policies, and has introduced numerous new services and features that benefit all of our stakeholders.

As the current Administrator of the usTLD, NeuStar provides the DoC the lowest possible risk as it relates to the continued stability of the entire DNS and the usTLD. NeuStar's technical and operational expertise combined with its robust institutional knowledge of the intricacies, complexities, and nuances of the usTLD are irreplaceable. NeuStar will continue to operate the usTLD and DNS on the existing infrastructure with zero risk of service disruption or degradation.

Any successful transition plan must address—in detail—both the "traditional" aspects of TLD operations as well as those services, policies and procedures which are unique to usTLD. These unique elements include:

- Locality-based Structure management
- kids.us registrations, content review, and management
- US nexus compliance and intended use
- Reserve name program
- Domain name review
- WHOIS accuracy and Proxy Registration Prohibition
- Registrar accreditation
- Take Down – Abusive Domain Name Registration practices

The usTLD operates in a special oversight environment with the DoC and incorporates a number of services and requirements that are unique in the industry.   NeuStar's experience in operating and managing these unique services can not be claimed by any other potential Contractor. NeuStar offers the best opportunity to ensure the continued, uninterrupted stability of the usTLD.

- NeuStar faces no transition and therefore offers no risk during such a period.
- NeuStar is the only entity that can claim operating experience with the entire suite of TLD services that comprise usTLD and therefore offers the lowest possible risk during ongoing operations.

B.1.6 usTLD Administration Consistent with ICANN Standards

NeuStar's management of the usTLD has been and will continue to be consistent with the Internet Corporation for Assigned Names and Number's (ICANN's) technical management of the DNS.

Although the Internet Corporation for Assigned Names and Numbers (ICANN) does not have a formal role governing the technical management of a ccTLD operator, there are a number of principles that can be extrapolated from ICANN's oversight over the gTLD domain name registries as well as from ICANN's Government Advisory Committee (GAC) guidelines for TLDs. NeuStar complies with each and every one of these requirements and has done so since the beginning of usTLD Administration. NeuStar is in full compliance with the following standards groups as defined by ICANN's technical management of the DNS:

- **DNS Data, Zone File, and Nameserver Maintenance** to perform the most critical function of a registrar;

- **Shared Registration System** to support robust competition among domain name registrars.

- **Data Security and Data Escrow** to ensure continuity of service for registrants in the event of a registry failure; and

- **Government Advisory Committee Principles,** where appropriate to operate the usTLD in the public interest.

B.1.7 Protection of Intellectual Property and Support of Sunrise

NeuStar recognizes and supports the need for appropriate protection of intellectual property in the usTLD. Additionally, in the event of further expansion of the usTLD space, NeuStar shall implement a sunrise period for qualified trade mark owners.

usTLD Dispute Resolution Policy (usDRP)

NeuStar successfully implemented and continues to operate the usDRP in accordance with all requirements of the usTLD. This policy sets forth the terms and conditions in regards to a dispute between usTLD registrants and any party other than the usTLD Administrator or accredited usTLD registrar. NeuStar has proven its ability to successfully administer this policy and we will continue to do so throughout the new contract term.

NeuStar has improved the Dispute Resolution Policies over the ones in place for gTLDs. These improvements were praised by both the World Intellectual Property Organization (WIPO) and the Intellectual Property Constituency of ICANN when it was adopted in NeuStar's .BIZ's Start-up Trademark Opposition Policy.

Sunrise

Both for the April 2002 launch of expanded second-level usTLD and kids.us spaces, NeuStar implemented a Sunrise policy for owners of United States trademark applications and registrations. Unlike any other "Sunrise" plan implemented or proposed, NeuStar validated the authenticity of Trademark applications and registrations with the U.S. Patent and Trademark Office through a unique and proprietary technological interface developed to ensure the integrity of the "Sunrise" process. In the event we launched a new expanded space in the usTLD, we would propose the same process as approved by the DoC and used successfully in 2002.

B.1.8 Consistent Communications with Critical Stakeholders

NeuStar has established and maintains consistent communication with the Contracting Officer's Technical Representative (COTR), the Contracting Office (CO), and ICANN. We represent the usTLD in the ICANN ccNSO and have and will continue to contribute to ICANN's operating costs as may be apportioned to the usTLD.

Despite various changes in personnel during the past six years at NTIA, NOAA and ICANN, NeuStar has maintained relationships with these organizations to ensure the smooth and efficient administration of the usTLD. NeuStar's goal has always been to serve as a reliable partner to each of these parties in the management of the usTLD, including reporting on the state of the usTLD, and advising all parties on the details of administrating the TLD from a technical, operational, policy, and business perspective.

Relationship with the ccNSO

As a founding member of the ccNSO, NeuStar contributed to the formulation and establishment of the first official country-code policy development body. Currently, NeuStar serves on the ccNSO Council and various working group. Beyond our contractual obligation to represent the usTLD as a member of the ccNSO, NeuStar has been very active in contributing to policy discussions and ensuring that NTIA is kept appraised of discussions and developments.

Relationship with ICANN / Accountability Framework

Through its operation of both the usTLD and the .biz gTLD, NeuStar has developed a solid relationship with both the ICANN staff and Board and remains in constant communication with them on gTLD matters as well as on applicable matters related to the operation and management of the usTLD, where appropriate. NeuStar is in the unique position of being able to leverage the expertise, knowledge and experience gained in its participation in these other fora and bring them to its leadership and management of the usTLD, where appropriate.

One of the other mechanisms contained in both the accountability framework document and the exchange of letters is a commitment to assist in the funding of ICANN's operations and policy development processes as they relate to the IANA and the ccNSO. In the event that the DoC is willing to agree to an appropriate accountability framework document or exchange of letters, NeuStar will commit to a fair and reasonable apportionment of fees commensurate with the amount paid by similarly situated ccTLD.

B.1.9. Robust usTLD Competition Promotes Choice and Service

NeuStar promotes robust competition within the usTLD, including registration services, to ensure greater choice and improved services for usTLD users.

Since October 2001, NeuStar has demonstrated our commitment to promoting robust competition within the usTLD by ensuring equal access to all .us-accredited registrars for registration services and equitable access to our promotion and marketing programs. NeuStar currently supports over 100 .us-accredited registrars that rely on NeuStar's neutral administration of the usTLD to compete effectively with one another to best serve users of the usTLD. We look forward to continuing our promotion of competition, greater choice and improved service within the usTLD.

To guarantee the promotion of real and robust competition in the usTLD, the ideal usTLD Administrator must be completely impartial in its dealings with registrars and should seek to avoid even the appearance of favoritism. Importantly, and unlike many gTLD registry operators, NeuStar is not controlled by, nor does it have any ownership in, any current or prospective usTLD registrar. Our neutrality is one of the many things that sets us apart from all other Quoters. NeuStar is fully committed to providing equivalent access to registrars and will continue to operate under a stringent code of conduct to ensure that all ICANN-accredited registrars have equivalent access to registry services and marketing programs.