**Internet Services Provider and Connectivity Provider Constituency (ISPCP) comment regarding Proposed 2013 RAA**

The ISPCP is not a member of the negotiating team with ICANN. However from our perspective it is necessary that the agreement is consistent in terms of balanced partnership.

First of all we focus on more general items and then add some specific points for consideration.

We support the request that all registries for new gTLDs use registrars having signed the 2013 RAA.

In addition we support the requirement the of a contact point at the registrars to handle WHOIS compliance issues.

Re “Public Access to Data on Registered Names (3.3)” we support ICANN’s proposed text to provide access not restricted to “thin” registries. However implementation of this requirement is to be seen in context with the developments under the new WHOIS project recently initiated.

Re § 6.3 of the proposed agreement we consider ICANN’s proposal to empower the ICANN board to amend the agreement in special cases unilaterally as seriously unbalancing the agreement. In a business environment we would never allow one contracting partner to do so in order to avoid mistrust from the entry into force. We urge the negotiating partners to find a balanced solution.