



Domain Name Registrar

February 26, 2016

Re: RRA Amendment Notification for .bank

Here is EnCirca's feedback on the proposed RRA amendment for the .BANK TLD.

The .BANK TLD is considered one of the most sensitive new gTLDs introduced by ICANN. As we all know, the banking community is a common target for cyber criminals. Thus, cybercrime prevention is the primary motivating factor behind the banking industry's decision to fund and operate the .BANK TLD.

The .BANK new TLD is designed to improve security and trust for consumers conducting online banking. As such, it has adopted rigorous eligibility requirements and security standards that all Registrars and Registrants must agree to in order to register and activate .BANK domain names. After nearly a year after launch, the Registry continues to consult with banking and security experts to refine and respond to issues that might detract from its stated mission and commitments. This includes the Security Standards Working Group, of which EnCirca has been an active participant.

All 25 ICANN Registrars who have signed the .BANK RRA were well aware of the .BANK Registry's commitment to ensure a secure and trusted namespace for online banking. As the registry consults with its Security Standards Working Group and Advisory Council, it must be able to be responsive to ensure it can satisfy its charter.

These extra requirements and standards are unprecedented for new gTLDs. As such, EnCirca fully supports the .BANK Registry's efforts to ensure potential registrants are fully informed by Registrars of their obligations and limitations for .BANK. This helps avoid confusion and mis-use by registrants, which can cause a loss of trust in the Registry's stated mission and commitments to the banking community.

In summary, EnCirca does not view any the proposed .BANK RRA changes as burdensome for a .BANK-accredited registrar and fully endorses all of the proposed changes for the .BANK RRA.

Respectfully,

Thomas Barrett
EnCirca President