

VIA NAMING SERVICES PORTAL

Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094
US

August 18, 2021

RE: .xxx Registry-Registrar Agreement Proposed Amendments

Dear ICANN,

Pursuant to Section 7.1 of the Registry Agreement executed between ICANN and ICM Registry LLC, dated 31 March 2011 we submit the below-described changes to our Registry-Registrar Agreement.

We respectfully request prompt review and approval of the revised Registry-Registrar Agreement. We also attach a 'redline' version showing the proposed changes to the current form of Registry-Registrar Agreement.

The changes proposed are for the purposes of streamlining and consolidating our Registry-Registrar Agreements following the recent acquisition of a number of TLDs. The changes to the Registry-Registrar Agreement are also described in the table below.

Section	Proposed Changes
Recitals	Update to Registry details and listing of Registrar particulars. Remove specific references to .xxx and refer to Exhibit C TLDs.
1. DEFINITIONS	Non-material formatting changes. Update definitions for consistency.
2. OBLIGATIONS OF REGISTRY OPERATOR (Previously 2. OBLIGATIONS OF ICM)	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clause related to access to Registry, use of Licensed Product, ICANN requirements, compliance actions, IDNs and RPMs for consistency with other RRAs.
3. OBLIGATIONS OF REGISTRAR	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clauses related to cooperation with technical analysis, third parties & resellers, authorization codes, cooperation with Registry, and TMCH periods for consistency with other RRAs.
4. FEES	Amendment and removal of clauses to update section for consistency with other RRAs. Insert references to Billing Policy.

5. CONFIDENTIALITY AND INTELLECTUAL PROPERTY	Amendment and removal of clauses to update section for consistency with other RRAs.
6. INDEMNITIES AND LIMITATION OF LIABILITY	Amendment and removal of clauses to update section for consistency with other RRAs.
7. INSURANCE	Delete Section for consistency with other RRAs.
7. DISPUTE RESOLUTION	Amendment of clauses for consistency with other RRAs
8. TERM AND TERMINATION	Amendment and removal of clauses to update section for consistency with other RRAs.
9. MISCELLANEOUS	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clauses related to attorney's fees, construction, and assurances for consistency with other RRAs. Update to format of notices contacts. Update to signature section - new Registry Operator.
Schedule 1 - 2	Schedules deleted in their entirety and replaced with new Exhibits A - C. Removal of redundant schedules, addition of new exhibits for consistency with other RRAs.
RRA Data Processing Addendum	Addendum deleted in its entirety and replaced with new Exhibit B.

We look forward to receiving ICANN's response as prescribed by the review and approval procedures. Should you have any questions or require further information, please do not hesitate to contact us.

Regards,



Crystal Peterson, Director
Registry Services, LLC on behalf of ICM Registry LLC