



May 6, 2022

Internet Corporation for Assigned Names and Numbers
Attn: Russ Weinstein, Vice President, Global Domains Services
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536
Via NSp

Re: Public Interest Registry's Registry-Registrar Agreement (RRA) for .CHARITY, .FOUNDATION, and .GIVES

Dear Russ:

As you know, PIR serves as the Registry Operator for .ORG, .NGO, .ONG, .OPF (xn--c1avg), .机构 (xn--nqv7f), and .संगठन (xn--i1b6b1a6a2e) (the "**Current PIR TLDs**") and ICANN has provided Conditional Consent for the assignment of the Registry Agreements (the "**RAs**") for the .CHARITY, .FOUNDATION, and .GIVES TLDs (the "**Assigning TLDs**"). PIR previously submitted a proposed consolidated Registry-Registrar Agreement ("**RRA**") for ICANN's and the Registrar Stakeholder Group's (RrSG) consideration that would enable Registrars to become eligible to offer both the Current PIR TLDs as well as the Assigning TLDs. ICANN approved that RRA after input from the RrSG as it relates to the Current PIR TLDs earlier this month, but ICANN had not submitted the RRA for consideration as it relates to the Assigning TLDs because ICANN had not yet granted Conditional Consent for the assignment of those RAs.

On March 18, ICANN provided Conditional Consent for the assignment of the RAs for the Assigning TLDs and PIR now submits the RRA for ICANN's and the RrSG's consideration for the Assigning TLDs. ICANN staff has indicated that the RrSG prefers that PIR also provide a redline of this RRA against the Donuts RRA as it is the agreement currently in effect for the Assigning TLDs.

Our plan is that the Assigning TLDs would be covered by the PIR RRA immediately upon the assignment of the relevant RAs to PIR (which we anticipate to be June 1). The PIR RRA, recently approved by the RrSG, is a different agreement than the Donuts RRA. The primary difference between the Donuts RRA and this RRA is that PIR will be the Registry Operator and the PIR RRA covers only the TLDs for which PIR will be the Registry Operator. Beyond that, PIR is not currently a party to the Donuts RRA and our plan is not to assume that agreement.

As requested, we provide a redline of the Donuts RRA to the PIR RRA but note that we did not use the Donuts RRA as the basis of the PIR RRA, did not draft the Donuts RRA, and as a result are not in a position to answer questions on "changes" to that document, though we are happy to answer questions about the PIR RRA as it relates to the Assigning TLDs. We also again provide a clean version of the PIR RRA, which we think will be easier to review.

In submitting this PIR RRA, we note that this is the same RRA that was reviewed and approved by the RrSG only one month ago. The only change that was made from the version we



first submitted to ICANN and the RrSG is on page 5 which corrected a typo and inserted a comma between the words “phishing” and “piracy.” The RrSG noted this typo and we made that correction. Otherwise, **this RRA is verbatim to the RRA just reviewed and approved by the RrSG and ICANN.**

This RRA would not be effective for the Assigning TLDs until the assignments of the RAs are completed and PIR becomes the Registry Operator for them. In the event this process has not concluded by June 1, 2022, the Donuts RRA would temporarily be assigned to PIR only as it relates to the Assigning TLDs until such time as the PIR RRA is approved for the Assigning TLDs. We appreciate ICANN’s and the RrSG’s review and are happy to make ourselves available to answer any questions or comments that either ICANN or the Registrars may have.

Best regards,

PUBLIC INTEREST REGISTRY

A handwritten signature in blue ink, appearing to read "Brian Cimbolic".

Brian Cimbolic
Vice President, General Counsel

Enclosures