

VIA E-MAIL (Russ.Weinstein@ICANN.org)

Russ Weinstein
Vice President, GDD Accounts and Services
ICANN
12025 Waterfront Drive
Los Angeles, CA 90094-2536

24 August 2022

Re: Proposed Amendments to Registry-Registrar Agreement for .LINK

Dear Sirs:

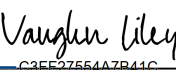
As you know, Nova Registry Ltd. acquired the right to operate the .LINK gTLD from UNR Corp (formerly known as Uniregistry). Accordingly, we wish to update the Registry-Registrar Agreement (RRA) and, update the below matters:

- Change of Registry Operator information and Notices contacts
- Changes to reflect services are provided by third party Registry Services Provider
- Changes in the Fees section to increase the notice period
- Introduction of new premium name tiers with set notices period
- Changes of Jurisdiction

Please find enclosed herewith, a proposed revised Registry-Registrar Agreement for .LINK gTLD, together with a redline version of the proposed agreement which reflects a comparison of the new proposed RRA to the existing Uniregistry RRA for all its TLDs. The Annex to this letter sets out a list of the proposed revisions and our reasons for same.

Please let us know if you have any questions or comments.

Yours faithfully
NOVA REGISTRY LTD.

DocuSigned by:

C3FF27554A7B41C...
Vaughn Liley, General Manager

Encl.

Annex: Summary of Changes to LINK RRA

Below is a summary of the proposed changes and reasons. Sections where the only change is replacing “UNR” with Registry Operator are not included in this summary.

Sections of RRA	Reasons
Parties	Nova Registry is now the licensed Registry Operator as amended on)_____,
Section 1 - Definitions	<ul style="list-style-type: none"> • Added a definition of a Back-End Registry Operator • Modified definition of the Console to remove URL which may change during the course of the agreement. • Added definition of the Registry Services Provider • Created a defined term for the ICANN Registry Agreement • Added Registry Agreement definition • Redefined TLD to be .LINK and any future TLD acquired or assigned by Nova registry at Exhibit A
Section 2 -	<ul style="list-style-type: none"> • Most of the changes are to substitute Registry Operator or UNR and introducing the Registry Services Provider • 2.6 amended language to include agreement to the Data Processing Addendum now at Exhibit C • 2.7: included RDAP with WHOIS • 2.11.: included the right for to take action to address DNS Abuse, replaced “Terms of Service” with “other policies” • 2.13 corrected references to the URS • 2.14 deleted as Registry Operator will supply new website address it’s not a necessary obligation. • 2.24: Moved Section 3.3 to 2.24 the changes to the System section. The new section is basically the same as the old one.
Section 3 License	Minor changes to reflect RSP and removal of UNR and move of section 3.3
Section 4 Support	Added new heading Changes to reflect RSP and removal of UNR
Section 5 - Fees	<ul style="list-style-type: none"> • 5.1 (was 4.1) included the 180 days’ notice into this section • 5.3 (was 4.2) included a provision relating to the Restore Fee which was not in the old agreement. • 5.5 (was 4.5) Revised Payment Security section to be much more flexible for the Registrar in line with current practice • 5.6 (was 4.6) Changed the Fees Due section to reflect the dual operations of both pre-pay and Post Pay model which is how it operates currently.
Section 7 (previously 6)	<ul style="list-style-type: none"> • 7.3: Changed legal status to Malta where Nova Registry is incorporated and

	<ul style="list-style-type: none">• 7.4: Simplified terminology to refer to System and Licensed Product
Miscellaneous	<ul style="list-style-type: none">• 8.6 (was 7.6): Changed Choice of Law/Venue to Malta• 8.7: (was 7.7) Changed Notices to reflect new contact info.
Exhibit A (New)	List of TLDs for RRA - LINK
Exhibit B (New)	Sets out Fees
Exhibit C Data Processing Addendum	<ul style="list-style-type: none">• Corrected some Typos