

CONFIDENTIAL – NOT FOR PUBLICATION

June 17, 2024

VIA NAMING SERVICES PORTAL

Russ Weinstein
Vice President GDD Accounts & Services
Internet Corporation for Assigned Names and Numbers
12025 Waterfront drive, Suite 300
Los Angeles, CA 90094-2536

RE: Identity Digital RRA Updates

Dear Mr. Weinstein,

Identity Digital Inc., formerly Donuts Inc., on behalf of its registry operator subsidiaries Binky Moon, LLC, Dog Beach, LLC, Identity Digital Limited, Monolith Registry LLC, and Global Website TLD Asia Limited (collectively, “Identity Digital”), wishes to amend the Registry-Registrar Agreement (“RRA”) for the top-level domains listed in **Exhibit A** (the “TLDs”).

We have included with this submission a redlined version of the RRA showing our proposed changes, a clean version of the RRA, a redlined version of the Data Processing Agreement (“DPA”) showing the proposed changes, and a clean version of the DPA. We anticipate the changes detailed below will be of particular interest to registrars and wish to be as transparent as possible about our motivations for seeking the proposed changes. The relevant sections of the RRA are noted below in bold.

1. Corporate re-branding: Throughout the document references to “Donuts” have been updated to refer to “Identity Digital.” In 2021, Donuts Inc. undertook a rebrand and changed its corporate name to Identity Digital Inc. There is no change to the legal contracting entity in the RRA besides an update to the entity’s name. Documentation showing the entity name change can be provided upon request.
2. Multiple Registrars: We have updated the signature block of the RRA as well as text in the **Introduction** to permit a registrar to sign one RRA on behalf of multiple registrars within its family of companies. Identity Digital has received multiple requests from registrars to simplify the onboarding process by allowing them to execute one RRA for an entire family of related registrars and we propose this change to facilitate this request.
3. Verifications: **Section 3.7.3.**, regarding procedures by which Identity Digital may verify compliance by the registrant of a domain name in the TLDs with the Registry Policies, has been updated to reflect that Identity Digital will soon no longer collect contact data

for domain names registered in the TLDs. Under the amended language, registrars may be required to verify registrant compliance with the Registry Policies on behalf of Identity Digital. We believe this change is beneficial to registrars, who prefer to handle interactions with their customers.

4. Obligation to Escrow Registration Data: **Section 3.7.3.** has been further amended to clarify that registrars are obligated to Identity Digital to comply with ICANN policies regarding escrowing registration data in the TLDs. Pursuant to the Registration Data Policy, Identity Digital will soon cease collecting all domain name contact data from registrars, making registrars the sole source of domain name ownership information for domain names registered in the TLDs. This proposed amendment enables Identity Digital to directly monitor a registrar's compliance with its data escrow obligations to ensure Identity Digital is able to reconstruct the zone in the event of a registrar's failure.
5. Document Structure: As requested by certain Registrars and in line with standard industry practice, forms of the Registry Policies are being relocated to be more accessible to registrars and registrants. The RRA has been updated to remove the exhibits containing the forms of certain Registry Policies, such as the Terms and Conditions, Payment Policy, and technical onboarding documentation, from the RRA itself. These Registry Policies will continue to be accessible to current and prospective registrars through the Registrar Admin Website or the Registry Website, as applicable. The proposed amendment does not impact existing requirements regarding changes or additions to these policies.

We hope that you will find these changes acceptable and agree with our recommendations. If you have any questions or concerns about our proposed changes, we are prepared to discuss them with you at your convenience. Please direct any such questions or concerns to myself at alvaro@identity.digital and my colleague, Omar Contreras at omar.contreras@identity.digital.

Sincerely,



Alvaro Alvarez
EVP, General Counsel & Secretary
Identity Digital Inc.

Exhibit A: TLDs and Registry Operator

TLD	Registry Operator
academy	Binky Moon, LLC
accountants	Binky Moon, LLC
actor	Dog Beach, LLC
agency	Binky Moon, LLC
airforce	Dog Beach, LLC
apartments	Binky Moon, LLC
archi	Identity Digital Limited
army	Dog Beach, LLC
associates	Binky Moon, LLC
attorney	Dog Beach, LLC
auction	Dog Beach, LLC
band	Dog Beach, LLC
bargains	Binky Moon, LLC
bet	Identity Digital Limited
bike	Binky Moon, LLC
bingo	Binky Moon, LLC
bio	Identity Digital Limited
black	Identity Digital Limited
blue	Identity Digital Limited
boutique	Binky Moon, LLC
broker	Dog Beach, LLC
builders	Binky Moon, LLC
business	Binky Moon, LLC
cab	Binky Moon, LLC
cafe	Binky Moon, LLC
camera	Binky Moon, LLC
camp	Binky Moon, LLC
capital	Binky Moon, LLC
cards	Binky Moon, LLC
care	Binky Moon, LLC
careers	Binky Moon, LLC
cash	Binky Moon, LLC
casino	Binky Moon, LLC
catering	Binky Moon, LLC
center	Binky Moon, LLC
chat	Binky Moon, LLC

cheap	Binky Moon, LLC
church	Binky Moon, LLC
city	Binky Moon, LLC
claims	Binky Moon, LLC
cleaning	Binky Moon, LLC
clinic	Binky Moon, LLC
clothing	Binky Moon, LLC
coach	Binky Moon, LLC
codes	Binky Moon, LLC
coffee	Binky Moon, LLC
community	Binky Moon, LLC
company	Binky Moon, LLC
computer	Binky Moon, LLC
condos	Binky Moon, LLC
construction	Binky Moon, LLC
consulting	Dog Beach, LLC
contact	Dog Beach, LLC
contractors	Binky Moon, LLC
cool	Binky Moon, LLC
coupons	Binky Moon, LLC
credit	Binky Moon, LLC
creditcard	Binky Moon, LLC
cruises	Binky Moon, LLC
dance	Dog Beach, LLC
dating	Binky Moon, LLC
deals	Binky Moon, LLC
degree	Dog Beach, LLC
delivery	Binky Moon, LLC
democrat	Dog Beach, LLC
dental	Binky Moon, LLC
dentist	Dog Beach, LLC
diamonds	Binky Moon, LLC
digital	Binky Moon, LLC
direct	Binky Moon, LLC
directory	Binky Moon, LLC
discount	Binky Moon, LLC
doctor	Binky Moon, LLC

dog	Binky Moon, LLC
domains	Binky Moon, LLC
education	Binky Moon, LLC
email	Binky Moon, LLC
energy	Binky Moon, LLC
engineer	Dog Beach, LLC
engineering	Binky Moon, LLC
enterprises	Binky Moon, LLC
equipment	Binky Moon, LLC
estate	Binky Moon, LLC
events	Binky Moon, LLC
exchange	Binky Moon, LLC
expert	Binky Moon, LLC
exposed	Binky Moon, LLC
express	Binky Moon, LLC
fail	Binky Moon, LLC
family	Dog Beach, LLC
fan	Dog Beach, LLC
farm	Binky Moon, LLC
finance	Binky Moon, LLC
financial	Binky Moon, LLC
fish	Binky Moon, LLC
fitness	Binky Moon, LLC
flights	Binky Moon, LLC
florist	Binky Moon, LLC
football	Binky Moon, LLC
forex	Dog Beach, LLC
forsale	Dog Beach, LLC
fund	Binky Moon, LLC
furniture	Binky Moon, LLC
futbol	Dog Beach, LLC
fyi	Binky Moon, LLC
gallery	Binky Moon, LLC
games	Dog Beach, LLC
gifts	Binky Moon, LLC
glass	Binky Moon, LLC
global	Identity Digital Limited
gmbh	Binky Moon, LLC
gold	Binky Moon, LLC

golf	Binky Moon, LLC
graphics	Binky Moon, LLC
gratis	Binky Moon, LLC
green	Identity Digital Limited
gripe	Binky Moon, LLC
group	Binky Moon, LLC
guide	Binky Moon, LLC
guru	Binky Moon, LLC
haus	Dog Beach, LLC
healthcare	Binky Moon, LLC
hockey	Binky Moon, LLC
holdings	Binky Moon, LLC
holiday	Binky Moon, LLC
hospital	Binky Moon, LLC
house	Binky Moon, LLC
immo	Binky Moon, LLC
immobilien	Dog Beach, LLC
industries	Binky Moon, LLC
info	Identity Digital Limited
institute	Binky Moon, LLC
insure	Binky Moon, LLC
international	Binky Moon, LLC
investments	Binky Moon, LLC
irish	Binky Moon, LLC
jetzt	Binky Moon, LLC
jewelry	Binky Moon, LLC
kaufen	Dog Beach, LLC
kim	Identity Digital Limited
kitchen	Binky Moon, LLC
land	Binky Moon, LLC
lawyer	Dog Beach, LLC
lease	Binky Moon, LLC
legal	Binky Moon, LLC
lgbt	Identity Digital Limited
life	Binky Moon, LLC
lighting	Binky Moon, LLC
limited	Binky Moon, LLC
limo	Binky Moon, LLC
live	Dog Beach, LLC

llc	Identity Digital Limited
loans	Binky Moon, LLC
lotto	Identity Digital Limited
ltd	Binky Moon, LLC
maison	Binky Moon, LLC
management	Binky Moon, LLC
market	Dog Beach, LLC
marketing	Binky Moon, LLC
markets	Dog Beach, LLC
mba	Binky Moon, LLC
media	Binky Moon, LLC
memorial	Dog Beach, LLC
mobi	Identity Digital Limited
moda	Dog Beach, LLC
money	Binky Moon, LLC
mortgage	Dog Beach, LLC
movie	Binky Moon, LLC
navy	Dog Beach, LLC
network	Binky Moon, LLC
news	Dog Beach, LLC
ninja	Dog Beach, LLC
organic	Identity Digital Limited
partners	Binky Moon, LLC
parts	Binky Moon, LLC
pet	Identity Digital Limited
photography	Binky Moon, LLC
photos	Binky Moon, LLC
pictures	Binky Moon, LLC
pink	Identity Digital Limited
pizza	Binky Moon, LLC
place	Binky Moon, LLC
plumbing	Binky Moon, LLC
plus	Binky Moon, LLC
poker	Identity Digital Limited
pro	Identity Digital Limited
productions	Binky Moon, LLC
promo	Identity Digital Limited
properties	Binky Moon, LLC
pub	Dog Beach, LLC

recipes	Binky Moon, LLC
red	Identity Digital Limited
rehab	Dog Beach, LLC
reise	Binky Moon, LLC
reisen	Binky Moon, LLC
rentals	Binky Moon, LLC
repair	Binky Moon, LLC
report	Binky Moon, LLC
republican	Dog Beach, LLC
restaurant	Binky Moon, LLC
reviews	Dog Beach, LLC
rip	Dog Beach, LLC
rocks	Dog Beach, LLC
run	Binky Moon, LLC
sale	Dog Beach, LLC
salon	Binky Moon, LLC
sarl	Binky Moon, LLC
school	Binky Moon, LLC
schule	Binky Moon, LLC
services	Binky Moon, LLC
shiksha	Identity Digital Limited
shoes	Binky Moon, LLC
shopping	Binky Moon, LLC
show	Binky Moon, LLC
singles	Binky Moon, LLC
ski	Identity Digital Limited
soccer	Binky Moon, LLC
social	Dog Beach, LLC
software	Dog Beach, LLC
solar	Binky Moon, LLC
solutions	Binky Moon, LLC
studio	Dog Beach, LLC
style	Binky Moon, LLC
supplies	Binky Moon, LLC
supply	Binky Moon, LLC
support	Binky Moon, LLC
surgery	Binky Moon, LLC
systems	Binky Moon, LLC
tax	Binky Moon, LLC

taxi	Binky Moon, LLC
team	Binky Moon, LLC
technology	Binky Moon, LLC
tennis	Binky Moon, LLC
theater	Binky Moon, LLC
tienda	Binky Moon, LLC
tips	Binky Moon, LLC
tires	Binky Moon, LLC
today	Binky Moon, LLC
tools	Binky Moon, LLC
tours	Binky Moon, LLC
town	Binky Moon, LLC
toys	Binky Moon, LLC
trading	Dog Beach, LLC
training	Binky Moon, LLC
travel	Dog Beach, LLC
university	Binky Moon, LLC
vacations	Binky Moon, LLC
ventures	Binky Moon, LLC
vet	Dog Beach, LLC
viajes	Binky Moon, LLC

video	Dog Beach, LLC
villas	Binky Moon, LLC
vin	Binky Moon, LLC
vision	Binky Moon, LLC
vote	Monolith Registry LLC
voto	Monolith Registry LLC
voyage	Binky Moon, LLC
watch	Binky Moon, LLC
watches	Identity Digital Limited
wine	Binky Moon, LLC
works	Binky Moon, LLC
world	Binky Moon, LLC
wtf	Binky Moon, LLC
	Global Website TLD Asia Limited
xn--5tzm5g	Identity Digital Limited
xn--6frz82g	Identity Digital Limited
xn--czrs0t	Binky Moon, LLC
xn--fjq720a	Binky Moon, LLC
xn--unup4y	Binky Moon, LLC
xn--vhquv	Binky Moon, LLC
zone	Binky Moon, LLC