

nameshop

Dear Board Chair Tripti Sinha and CEO Kurtis Lindquist,

Subject: Formal Request to Pause Automated Refund, Implement System Safeguards, and Delegate .Internet Ahead of the 2026 Round

To:

The Chair and Members of the ICANN Board & the CEO
Internet Corporation for Assigned Names and Numbers.

Please accept this formal communication in follow up on the interim reply Nameshop recently posted to pause the automated refund procedure initiated by Case 01484012 / 01576198. We wish to emphatically reiterate that this issue does not concern the application fee or a refund, but rather the .Internet string and the active status of our application.

This communication comes at a crucial phase as ICANN transitions from the 2012 application round processes to the upcoming 2026 application round. The experience of receiving automated, disconnected portal messages highlights a critical need for process and system safeguards to avoid unnecessary complications. Specifically, Nameshop respectfully submits that ICANN must ensure its automated processes remain well connected to the ongoing facts of the .Internet application currently in process.

We recall a similar absence of system safeguards in 2012 regarding our initial string, .IDN. Apart from the Applicant Guidebook's rules on three-character country codes being ambiguous, the 2012 application portal lacked automated electronic safeguards to warn and prevent applicants from applying for disallowed three-character codes—much in the manner of a standard sign-up form that automatically rejects special characters in the chosen user name. Establishing stronger connections between automated systems as in the Portal and actual application statuses will protect both ICANN and future applicants, who may not fully understand the history of this application, from mistakenly seeking to apply for this exact string in the upcoming round.

Reaffirming our faith in the ICANN Multistakeholder Process: Through 12 years of process delays, Nameshop has maintained an enduring faith in ICANN's multi-stakeholder governance. Our approach has always been purposefully non-confrontational, focusing on cooperative solutions rather than adversarial legal challenges.

Our core mission remains unchanged from 2012: to provide an ASCII bridge for isolated Internationalized Domain Name (IDN) webspaces, making them accessible globally to help preserve the Internet as a unified space ("One Internet"). When forced to utilize the official Change Request process in September 2012, updating the string to `.Internet` was a natural and logical progression that expanded upon this exact same mission.

Significant Public Interest Commitments and Safeguards To explicitly differentiate `.Internet` from purely commercial TLDs, Nameshop voluntarily drafted robust, legally binding Public Interest Commitments even before ICANN formally instituted the PIC process. We are committed to dedicating at least one-quarter (25%) of post-tax profits to a charitable foundation to support unfunded Internet related projects, or inadequately funded humanitarian causes globally. Furthermore, we will invite highly respected Internet pioneers and community leaders to our Management Board to ensure the string is managed responsibly and benevolently, as for instance by instituting policies and practices to protect culturally sensitive domain names and policies to mitigate DNS Abuse in every form.

While Nameshop is a 100% proprietary firm, this structure was chosen deliberately as a safeguard to protect our core vision from mercenary or purely commercial dilution. Among other commitments, it is our long-term vision to eventually transition an additional 26% of the equity to the `.Internet` Foundation or a meritorious charitable consortium, ensuring the long-term governance of the TLD serves collective community value.

These commitments are derived from faith in the varied strengths of the DNS and Internet Communities that Nameshop is to approach, and the commitments are made in full view of the ICANN Community and is to be deemed as stated and to be honored "whether or not ICANN has a process in place to enforce Public Interest Commitments".

The Necessary Request for Immediate Delegation In fairness to this 12-year journey, our specific request is to **delegate `.Internet` ahead of the next round evaluation cycle as an application of the 2012 round, or to take the string to an interim round to delegate `.Internet`.**

Resolving this application before the anticipated 2026 round is critical for several fairness-based reasons:

- **Protecting an Uncontested String:** The `.Internet` string was fully revealed through the official Change Request process, the original application's Priority Number 150 was in effect, and the string remains entirely uncontested. Pushing the application to the 2026 round would unjustly expose it to new challengers and accidental new applicants or others who are now well aware of the string's immense value.
- **Avoiding Unknown Regulatory Challenges:** Deferring the application subjects a 12-year-delayed application to entirely unknown shifts in rules and evaluation criteria, and potential delays which is fundamentally unfair.

- **Preventing Further Financial Harm:** As a small firm from India that has previously voiced a need for applicant support, deferring to 2026 would cause extended and substantial financial hardship and more years of foregone revenue.

We respectfully invite the Board and Executive to review the appended Annex, which provides a coherent, factual summary of the .Internet application timeline. From this timeline (summary), it is evident for ICANN to fully understand the historical procedural bottlenecks and accidental omissions in the processes, unusual rare in ICANN processes.

We stand completely ready to provide further information on our commitments—and any confidential commercial aspects—in a face-to-face meeting. We ask ICANN to delegate .Internet swiftly, for its immense potential to do good for the DNS, the global Internet, and the world, not merely by the Applicant's strength.

Thank you for your time, introspection, and consideration.

Respectfully,
Sivasubramanian Muthusamy
Nameshop
India

April 14, 2026

For ease of reference a timeline is annexed.

Annex: The Journey of .Internet: A Factual Timeline

1. The Original Application and the Change Request to .Internet (2012)

- **March 2012:** Nameshop filed a new gTLD application for the string **.IDN**. The core objective was to provide an ASCII bridge for Internationalized Domain Name (IDN) webspaces, making local-script domain names accessible globally to help preserve a unified Internet.
- **September 2012:** Recognizing that **.IDN** conflicted with Applicant Guidebook rules regarding alpha-3 country codes, **Nameshop utilized the official Change Request process to amend the string to .Internet**. This change aligned with the original mission of connecting global webspaces and fully conformed to all criteria. Consequently, the request to change the string to **.Internet** was published and the string was revealed. While ICANN initially assured that the request would be evaluated, the Change Request did not move forward without specific reasons or rationale provided. Nameshop appealed to ICANN CEO and the gTLD program committee to approve the change and further followed up on the appeal by more formal processes.
- **Public Interest Commitments (PICs):** Together with the Change Request, months before ICANN formally instituted the PIC process, Nameshop voluntarily submitted legally binding commitments. These included setting aside 25% of post-tax profits for a foundation to support the Internet and humanitarian causes, and establishing an advisory board of Internet leaders. These commitments were later reaffirmed through Specification 11 and further expanded and reaffirmed as expanded as binding whether or not ICANN has a formal process in place to enforce the Public Interest Commitments.

2. Initial Evaluations and the Reconsideration Request (Early 2013)

- **February - March 2013:** The Change Request for **.Internet** and the Applicant Support Request did not move forward during the initial evaluation phase. Nameshop submitted an appeal to ICANN leadership in late February 2013 seeking to clarify the application's conformity with the evaluation criteria.
- **Reconsideration Request 13-2:** Seeking a formal review of the application's status, Nameshop filed a Reconsideration Request on March 29, 2013. This filing was based on the timeline of the "inaction" regarding its February appeal.
- **Board Governance Committee (BGC) Action:** On May 1, 2013, the BGC recommended denying the Reconsideration Request. The BGC measured the 30-day filing window from the original February evaluation decision rather than the subsequent appeal, and noted that the reconsideration process was not designed for a substantive reevaluation of applications. This was elaborately challenged by Nameshop.

3. Engagement with the Ombudsman (Mid 2013)

- **Filing the Complaint:** Following advice received during the April 2013 ICANN meeting in Beijing, Nameshop formally approached the ICANN Ombudsman in May 2013 to request a review of the procedural steps.
- **Jurisdictional Review:** The Ombudsman issued a draft decision indicating that the office faced jurisdictional limitations due to the concurrent BGC Reconsideration process. The Ombudsman's review was not substantive.
- **Nameshop's Response:** On May 23, 2013, Nameshop provided further detailed clarifications and respectfully requested that the Ombudsman process not be interrupted midway due to these procedural boundaries. The Ombudsman reviewed these inputs but ultimately maintained the initial decision to close the file without heeding arguments.

4. The Cooperative Engagement Process (2015 - 2016)

- **Initiating the CEP:** Preferring an internal, amicable resolution over formal external legal arbitration (such as an Independent Review Process or IRP), Nameshop initiated the Cooperative Engagement Process (CEP) in July 2015.
- **CEP Conclusion:** Following meetings and correspondence, ICANN notified Nameshop in May 2016 of its intent to conclude the CEP. While Nameshop expressed a strong desire to extend the timeframe to continue dialogue, the CEP as a formal process was discontinued unilaterally.

5. Mission Expansion and Continued Dialogue (2019 - 2021)

- **Setting the Record Straight:** In 2019, Nameshop followed up on its communications with the Board and CEO and submitted the document "*A fair summary of Nameshop issues concerning .Internet*" to officially clarify the application's history and ensure the public record reflected that the application had been for **.Internet** since 2012.
- **The Proprietary Safeguard:** In 2020, Nameshop confidentially detailed its 100% proprietary company structure to ICANN. This was explained as a necessary safeguard to protect the public interest vision from purely commercial dilution. Nameshop simultaneously outlined a long-term plan to transition 26% of equity to the **.Internet** Foundation or a similar charitable consortium over a 7-to-10-year period.
- **Pandemic Response & Beyond:** During the COVID-19 pandemic, Nameshop expanded its mission, offering to operate **.Internet** as a "clean new space" for IGOs, NGOs, and civil society to coordinate global relief efforts and combat DNS abuse. While the pandemic has passed, the intent to be responsive to significant global needs remains unchanged.

6. Ombuds Transition and Present Status (2023 - 2026)

- **The Ombuds Office:** Nameshop transitioned the issues to the new ICANN Ombuds Office. Nameshop continuously engaged with community leaders and the Ombuds to

highlight the public interest value of the string and the practical need to delegate the uncontested application prior to the next gTLD round.

- **March 2026 Portal Communication:** On March 12, 2026, a disconnected, automated portal message initiated a refund procedure. Nameshop promptly posted an interim reply to respectfully pause the automated action and maintain the application's active status. The reply reiterated Nameshop's enduring mission, stating factually: *"The issue does not concern fee or money but the [.INTERNET] string."* A detailed response is now sent to request delegation of .Internet ahead of the next round.