Code of Conduct Exemption Request Form

FOR .ANALYTICS

July 28, 2015

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

Attention: New gTLD Program Staff

RE: Request for Exemption from Registry Operator Code of Conduct

Campus IP LLC ("Registry Operator") ("Campus IP"), in connection with the execution of the Registry Agreement for the .ANALYTICS string (the "Registry Agreement"), hereby requests an exemption from the obligations of the Registry Operator Code of Conduct set forth in Specification 9 to the Registry Agreement (the "Code of Conduct"). Pursuant to such request, Registry Operator confirms that each of the following statements is true and correct (collectively, referred to as the "Statements"):

1. All domain name registrations in the TLD shall be registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliates (as defined in the Registry Agreement);

2. Registry Operator shall not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Registry Operator; and

3. Application of the Code of Conduct to the TLD is not necessary to protect the public interest as defined below. An additional supplement supporting this request is also attached.

   a) Campus IP is a wholly owned subsidiary of SAS Institute Inc. (hereinafter collectively "SAS"), a global market leader in providing technology solutions that drive innovation and improve performance through the use of its branded analytics products and services. Campus IP will serve as the Registry Operator of the string .ANALYTICS and SAS and its Affiliates, as defined in the Registry Agreement, shall be the sole registrant. .ANALYTICS will be a SAS branded top level domain that will seek to provide internet users with the confidence that all of the programming, information, social media, and business products found on the .ANALYTICS branded top level domain is authentic, genuine, safe and secure and affiliated with the SAS brand.

   b) Internet users will benefit from the requested exemption because it will enable .ANALYTICS to maintain trust and reliability while providing an enhanced online experience for consumers and its customers. Greater control over the domain as a registry operator is a prerequisite to .ANALYTICS ability to provide these enhancements and ensure the quality and reliability of the content.

c) Registry Operator will carefully monitor and safeguard the user experience to provide users with the confidence that they have located the one and only SAS analytics branded products, services and related information.

d) .ANALYTICS will provide users who navigate within .ANALYTICS privacy protection similar to what is currently provided within SAS's .COM spaces. Registry Operator will annually review and audit these policies to ensure that best practices are being employed to protect the safety, security and confidentiality of its users.

e) Granting the Exemption Request will not materially affect third parties nor will it be perceived as unfair to the general Internet community. To the contrary, SAS's use of the TLD as a closed ecosystem will provide the opportunity to distinguish web spaces it owns and operates from other spaces online, making it easier for internet users to more efficiently locate SAS products and services. The TLD will provide a trusted and user-friendly environment where domain names and content related to the TLD can flourish. Users will be able to clearly identify and select specific sites based upon their preferences.

f) The TLD ultimately is intended to serve SAS's integrated online branding and services platform. It is intended to function with leading-edge technologies and business practices, ensuring a trustworthy and positive user experience. The goal is to use SAS's online infrastructure, services and marketing to encourage Internet users to interact with the company online. SAS intends to use advanced technical and policy measures to ensure the security and reliability of online transactions and communications taking place on domains within the TLD, and to ensure that domain names in the TLD are only used for authorized purposes.

g) Registry Operator represents that the registration policies attached hereto as Exhibit A are a true and correct copy of the Registry Operator's registration policies for the TLD. Registry Operator agrees that if Registry Operator makes any changes to its registration policies (whether before or after an exemption has been granted), it will promptly provide ICANN with a revised set of registration policies.

Registry Operator acknowledges and agrees that in the event that any of the foregoing Statements becomes untrue (including after ICANN has granted an exemption pursuant to this exemption request), any Code of Conduct exemption granted by ICANN to Registry Operator for the TLD shall immediately expire, and Registry Operator shall (i) immediately notify ICANN specifying in reasonable detail the circumstances causing any of the Statements to be untrue and (ii) immediately comply with the Code of Conduct.

Registry Operator further acknowledges and agrees that ICANN may revoke this exemption at any time based upon evidence reasonably satisfactory to ICANN that the Statements have become untrue.

In the event that ICANN provides notice that it has revoked this exemption, Registry Operator shall immediately comply with the Code of Conduct. Questions about this request should be directed to the Registry Operator's primary point of contact,███████████, Registry Operations Manager,███████████████████

Submitted by:

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Vice President, Campus IP LLC

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Exhibit A

Domain Name Registration and Use Policy for ".ANALYTICS"

Registry Operator hereby acknowledges that the following are true and correct registration policies:

Registry Operator intends to operate the TLD as a closed registry with SAS and its Affiliates, as defined in the Registry Agreement, as the sole registrant. The goal of the proposed gTLD is to provide SAS the opportunity to extend the digital experience to its consumers and users through a dedicated and authentic domain space for SAS products and services, content, social and sharing platforms, and other integrated online digital experiences for the benefit of Internet users. This specialization provides a mechanism by which SAS can easily link its products, services and countries of operation. This will allow SAS to actively manage the introduction and phase out of second-level domain spaces for new or retiring products, services, content and digital experiences to the benefit of Internet users in a trusted and authentic environment.

Members of the public will not be able to register domain names in this new gTLD. Registration will be managed by Registry Operator and its parent company, SAS Institute Inc., and only a limited number of designated SAS personnel or designees will be able to register domain names. If multiple parties affiliated with SAS express an interest in registering the same domain name, the designated personnel will make the decision regarding which internal party's registry and use of the domain name is a higher business priority for SAS. SAS may, in its sole discretion, elect to license registrations within this space to, *inter alia*, appropriate corporate divisions, subsidiaries, affiliated and/or third party authorized licensees.

Except for those provisions not applicable to a Specification 9 exempt registry, Registry Operator will abide by all policies, rights protection mechanisms and registration procedures as set forth in the Registry Agreement.

Request for Exemption from Specification 9 Code of Conduct
Supplemental Information

Campus IP LLC, is a wholly owned subsidiary of SAS Institute Inc. (hereinafter collectively referred to as "SAS"), a global market leader in providing technology solutions that drive innovation and improve performance. SAS is the leader in business analytics software and services, and the largest independent vendor in the business intelligence market. Through innovative solutions, SAS helps customers at more than 75,000 sites improve performance and delivery value by making better decisions faster. Since 1976, SAS has been giving customers around the world The Power to Know through its analytics products and services.

SAS applied for and intends to operate the .ANALTYICS gTLD as an exclusive registry specifically to promote its SAS products, services and provide secure access to its customers around the world. SAS respectfully requests that it be granted an exemption from the Specification 9 Code of Conduct. In furtherance of this request, additional information is provided below.
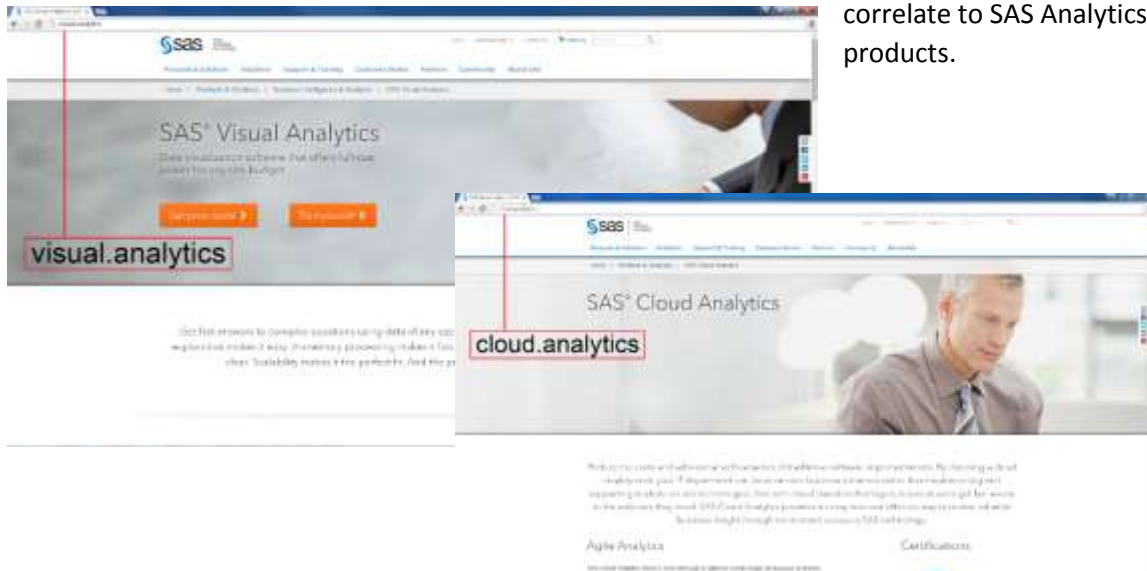
Current Web Site Home Page

A screen shot of SAS's current home page navigation is dropped in below. Please note that throughout the web site, the term ANALYTICS is used to define products and services of SAS. The prevalent use of the brand ANALTYICS throughout all of SAS's marketing materials and promotional messages led the leadership team of SAS to make the investment in the string .ANALTYICS to provide for a safe, secure and trusted environment for consumers who have come to know and trust SAS analytics products and services. The string .ANALYTICS is a clear strategic branded space to provide assurances of trust and security to our customers. The Applicant Guidebook, which was relied upon by SAS in making the investment in the .ANALYTICS string, clearly provides for the Specification 9 exemption for applicants like SAS (see more below).

SAS.COM HOME PAGE

Possible Use Cases

We have provided a few possible use cases that show the intended use is to create SAS specific spaces and not to operate a generic space. Please note these are still just possible ideas or ways in which SAS may use the space. For example, we could build out our product pages in this space that specifically correlate to SAS Analytics products.

Additionally, we may provide secure login pages for our customers. Using *Acme* as a fictitious example, we could now provide authentic, secure and safe spaces for our customer to login to SAS Analytics.

Many other potential uses are in development that further and promote SAS Analytics and build upon the consumer trust that is placed in SAS for its innovative products and services.

Trademarks in Progress

While we did not have a trademark registration for ANALTYICS timely to apply to apply as a Specification 13 brand registry, we are in the process of trademarking ANALYTICS. We anticipate these trademark applications will become registered trademarks. While current policy does not allow for us to become a Specification 13 registry, should that policy change in the future, we may elect to become a Specification 13 registry. Our intention is to operate as a Dot Brand space, in compliance with the Specification 9 exemption requirements, as contemplated under the original Applicant Guidebook.

Legal & Policy Considerations

We understand that there are legal and operational requirements to operate as a Specification 9 Exempt Registry. Specification 9, paragraph 6 provides:

Registry Operator may request an exemption to this Code of Conduct, and such exemption may be granted by ICANN in ICANN's reasonable discretion, if Registry Operator demonstrates to ICANN's reasonable satisfaction that (i) all domain name registrations in the TLD are registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliates, (ii) Registry Operator does not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Registry Operator, and (iii) application of this Code of Conduct to the TLD is not necessary to protect the public interest.

In this instance, SAS meets all three criteria:

1. All domain name registrations will be for the exclusive use of SAS and its Affiliates.
2. SAS will not sell, distribute or transfer control or use to a third party that is not an Affiliate.
3. The application of the Code of Conduct is not necessary to protect the public interest.

Additionally, the intended use of .ANALYTICS does not violate Specification 11 3 (d), which states:

Registry Operator of a "Generic String" TLD may not impose eligibility criteria for registering names in the TLD that limit registrations exclusively to a single person or entity and/or that person's or entity's "Affiliates" (as defined in Section 2.9(c) of the Registry Agreement). "Generic String" means a string consisting of a word or term that denominates or describes a general class of goods, services, groups, organizations or things, as opposed to distinguishing a specific brand of goods, services, groups, organizations or things from those of others.

SAS will not be operating .ANALYTICS to refer to a general class of goods or services, but rather very distinguished and specific goods and services attributed to SAS, consistent with Specification 9 and Specification 11. Throughout its nearly 40-year history, SAS has demonstrated that its products, goods and services are synonymous with analytics. The public interest will be served by SAS operating ANALYTICS as a trusted, safe and secure environment associated with the SAS ANALYTICS brand. SAS relied upon the Applicant Guidebook in 2012 when it made the investment decision to apply for and pursue the gTLD .ANALYTICS and specifically relied upon its ability to operate as a Specification 9 exempt registry as provided for herein.

We respectfully request that you grant the Specification 9 exemption request from the code of conduct and understand the requirements of operating a Specification 9 exempt registry. If additional information or clarity is needed to consider this application, please let us know and we will be happy to provide more details.