

LIFESTYLE DOMAIN HOLDINGS, INC.

Code of Conduct Exemption Request Form

FOR .CITYEATS

August 22, 2014

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

Lifestyle Domain Holdings, Inc. (“Registry Operator”) (“LDH”), in connection with the execution of the Registry Agreement for the .CITYEATS 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 for the following reasons:
 - a) Lifestyle Domain Holdings, Inc., (“LDH”) is a wholly owned subsidiary of Scripps Networks Interactive, Inc. (“SNI”), a leader in lifestyle media with famous brands such as Food Network, Cooking Channel, HGTV, and DIY Network, to name just a few. LDH will serve as the Registry Operator of the string .CITYEATS and SNI and its Affiliates, as defined in the Registry Agreement, shall be the sole registrant. The mission of .CITYEATS is to provide diverse internet users an enhanced online experience through high quality programming, content, information and authentic connected experiences centered on travel, design, entertainment, food, home life, entertaining, self-help, and other related concepts, topics and activities. .CITYEATS will be an SNI branded top level domain that will seek to provide internet users with the confidence that all of the programming, information, social media, shopping and lifestyle opportunities found on the .CITYEATS branded top level domain is authentic, genuine, safe and secure and affiliated with SNI’s family of lifestyle brands.

- b) The mission of .CITYEATS is to provide a diverse population of internet users high-profile lifestyle-oriented content that is reflective of our popular lifestyle brands and allows users access to relevant ideas, information and solutions every day, everywhere. .CITYEATS will be focused on the development of robust and authentic connected experiences centered on travel, home (e.g., design and decor, gardening, real estate, home improvement and remodeling), food (cooking, nutrition), entertaining, parenting, self-help, and other related concepts, topics and activities.
- c) Internet users will benefit from the requested exemption because it will enable .CITYEATS to maintain trust and reliability while providing an enhanced online experience that will include personalization and customization of content. Greater control over the domain as a registry operator is a prerequisite to .CITYEATS's ability to provide these enhancements and ensure the quality and reliability of the content.
- d) Registry Operator will carefully monitor and safeguard the user experience to provide existing users with the confidence that they have located the award-winning SNI family of brands. New users will quickly come to recognize that the brand "CITYEATS" represents SNI, an authentic, high quality, trusted source for lifestyle-related entertainment, experiences, products and services.
- e) .CITYEATS will provide users who navigate within .CITYEATS privacy protection similar to what is currently provided within SNI's family of brand-based .coms (e.g. foodnetwork.com, hgtv.com). 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.
- f) 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, SNI'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 SNI 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.
- g) The TLD ultimately is intended to serve SNI'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 SNI's online infrastructure, services and marketing to encourage Internet users to interact with the company online. SNI 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.
- h) 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 Jennifer Wolfe, 513.746.2801, jwolfe@wolfe-sbmc.com, the Contracting Point of Contact.

Submitted by:
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EVP & Chief Legal Officer
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Exhibit A

Domain Name Registration and Use Policy for “.CITYEATS”

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 SNI and its Affiliates, as defined in the Registry Agreement, as the sole registrant. The goal of the proposed gTLD is to provide SNI and its family of brands the opportunity to extend the digital experience to its consumers and users through a dedicated and authentic domain space for SNI products and services, content, social and sharing platforms, shopping and other integrated online digital experiences for the benefit of Internet users. This specialization provides a mechanism by which SNI can easily link its products, services and countries of operation. This will allow SNI 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, SNI, and only a limited number of designated SNI personnel or designees will be able to register domain names. If multiple parties affiliated with SNI 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 SNI and its family of lifestyle brands. SNI 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.