

April 19, 2022

Re: Forum's Comments to the UDRP Policy Status Report

FORUM has been a provider of UDRP services since 1999 and is one of two providers also administering URS disputes since 2013.

In this short submission, FORUM intends to clarify some factual inaccuracies within the report regarding references to FORUM specifically and provide a general statement regarding the potential review of the UDRP.

Issues for Clarification

First, Forum's filing fees referenced on page 49 are no longer accurate. As of October 1, 2019, the filing fees were increased as follows:

| Number of Disputed Domain Names | Single-Member Panel | Three-Member Panel |
|------------------------------------|----------------------------|--------------------|
| 1-2 | \$1,330 | \$2,660 |
| 3-5 | \$1,480 | \$2,960 |
| 6-10 | \$1,830 | \$3,660 |
| 11-15 | \$2,280 | \$4,560 |
| 16 or more | In consultation with Forum | |

Please note, however, as the report covers the years 2013 through 2020, the fees listed in the report were correct for the majority of the years from which the data in the report was drawn.

Second, page 53 states that "FORUM allows supplementary complaints and responses subject to an additional fee." As of October 1, 2019, FORUM amended its Supplemental Rules by eliminating the fee and revising Rule 7 to read as follows:

"If a party requests an additional written submission be considered by the Panel, the additional submission must be sent to Forum along with proof of service on the opposing party(s). FORUM will forward all additional submissions to the Panel. It is within the discretion of the Panel to accept or consider additional unsolicited submission(s)."

Until 2019, FORUM did charge a fee to process additional submissions in an attempt to reduce the number of unsolicited additional submissions received.

General Comment

As seen from the public comments submitted, there is some disagreement as to what changes, if any, should be addressed in Phase 2 with respect to the UDRP. Most stakeholders, however, would agree that overall the UDRP is successful. FORUM looks forward to engaging with the community to promote consistency and confidence in the UDRP to build on that success in the years to come.

FORUM will continue to be a resource for any review of the UDRP, but will leave it to the community as to what shape any review should take.

Yours truly, Forum

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