19 May 2022

Via Email

Altanovo Domains Limited
c/o Counsel for Altanovo Domains Limited
Mr. Arif Hyder Ali (arif.ali@dechert.com)
Dechert LLP

Nu Dotco, LLC
c/o Counsel for Nu Dotco, LLC
Mr. Steven A. Marenberg (stevenmarenberg@paulhastings.com)
Paul Hastings LLP

Verisign, Inc.
c/o Counsel for Verisign, Inc.
Mr. Ronald L. Johnston (Ronald.Johnston@arnoldporter.com)
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Dear Altanovo Domains Limited, Nu Dotco, LLC and Verisign, Inc.,

Pursuant to Board Resolution 2022.03.10.06, the Board Accountability Mechanisms Committee (BAMC) will "review, consider, and evaluate the allegations relating to the Domain Acquisition Agreement (DAA) between" Nu Dotco LLC (NDC) and Verisign, Inc., "and the allegations relating to [Afilias Domains No. 3 Ltd.'s (now Altanovo Domains Limited)] conduct during the Auction Blackout Period" of the .WEB Auction.

In order to ensure that the BAMC is reviewing a complete picture of the parties' positions, as well as the supporting materials regarding each issue (the DAA and the Auction Blackout Period), the BAMC hereby requests that Altanovo, NDC and Verisign provide a comprehensive written summary of their claims and the materials supporting their claims. These submissions are meant to supersede both the submissions in the .WEB Independent Review Process (IRP) as well as the correspondence on these topics; and these submissions will represent the basis upon which the BAMC will review, consider, and evaluate the allegations relating to the DAA and the allegations relating to the Auction Blackout Period.

The BAMC strongly encourages the parties to be as succinct as possible in their submissions. Along those lines, the initial submissions of each set of parties will be limited to 75 pages inclusive of any footnotes or endnotes, meaning that Afilias/Altanovo's submission is limited to 75 pages and NDC/Verisign's submission is limited to 75 pages collectively. The parties will also have an opportunity to provide reply submissions, which will be limited to 30 pages inclusive of any footnotes or endnotes for each set of parties. The BAMC further requests that

the submissions include an Executive Summary, as well as a Table of Contents. Also, in an effort to be conscious of the volume of supporting materials, the BAMC requests that the parties' submission of supporting materials contain an index and, where possible, include a link/URL address for the location of the document instead of attaching the document itself.[1]

These submissions and supporting materials will be publicly posted on ICANN's website. However, consideration will be provided to suggested redactions before posting. Accordingly, when you provide your submissions (initial and reply), please also provide a separate version with proposed redactions for consideration in our public posting.

If Altanovo, NDC, and Verisign choose to provide the above-described submissions, the BAMC requests that the parties provide their initial submissions and supporting materials to ICANN via email at independentreview@icann.org by 15 July 2022. Reply submissions are due on 15 August 2022. If the parties feel as though additional time is needed, the BAMC asks that the parties confer and provide ICANN with new proposed submission dates, via email at independentreview@icann.org.

Best regards,

J. Beckwith Burr
Chair, Board Accountability Mechanisms Committee (BAMC)
ICANN

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[1] For instance, reference to the Bylaws should be a link to the applicable Bylaws, not an attachment of the full Bylaws. Similarly, if there are materials that have been previously submitted in the IRP, the party should provide a link and specific identification (e.g., exhibit number) of the operative exhibit. If the posted exhibit is redacted, the party may attach the unredacted version to its BAMC submission.