



December 17, 2019

Maarten Botterman, Board Chair
ICANN Board Members
Goran Marby, CEO
John Jeffries, General Counsel
Cyrus Nemazi, SVP, Global Domains Division
Via E-Mail
With Attachment

Re: Change in Control of the .ORG Registry

Dear ICANN Board and Leadership,

We write to thank ICANN for requesting that Public Interest Registry (PIR) and the Internet Society (ISOC) provide more information to ICANN about the proposed sale of PIR to Ethos Capital. We appreciate ICANN's call for transparency into this secretive deal. We encourage ICANN to go further, and withhold its approval for this change in control of the .ORG registry, unless and until PIR makes concrete and binding commitments to operate the registry in the best interests of noncommercial civil society registrants.

We enclose a letter signed by over 400 nonprofit entities / NGOs who are registrants in the .ORG top-level domain. The signatories include Access Now, Open Society Foundations, Communications Workers of America, Girl Scouts of the USA, Greenpeace, Human Rights Watch, the League of Women Voters, the National Council of Nonprofits, Oxfam, the European Climate Foundation, Derechos Digitales, the Gulf Centre for Human Rights, ICT Watch Indonesia, Integrity Watch Afghanistan, Media Foundation for West Africa, and many more.

The signatories on this letter are digital rights organizations, tech-focused groups, food banks and hunger relief organizations, co-ops, community art galleries and theaters, local humane societies, youth groups, community centers, mental health clinics, fitness groups, churches and religious organizations, libraries, unions and trade groups, violence prevention organizations, human rights and aid agencies, outdoor, environmental, and wildlife protection groups, radio stations, and research foundations.

They are joined by over 18,000 individuals who have added their names to the letter. These organizations and individuals are concerned about the sale of PIR and the way it has been conducted to date.

Many of the organizations signing the enclosed letter have used domain names in .ORG as the foundation of their online identities for years, if not decades. The difficulty of

changing to a different top-level domain—which approaches impossibility for some—makes them vulnerable to the policy and business practices of the .ORG registry operator.

The .ORG registry is unique. It is recognized the world over as the home of NGOs and other groups that act for the public good. Many .ORG registrants work to hold governments *and* corporations to account. They face all of the risks inherent in speaking truth to power, including becoming targets for censorship and repression. Eighteen years ago, ICANN proposed to find a new operator for .ORG, to achieve a “registry returned . . . to its originally intended function as a registry operated by and for non-profit organizations.” When ISOC founded PIR to fill that role, the previous operator, Verisign, gave the new registry operator \$5 million “to be used to fund future operating costs of the non-profit entity designated by ICANN as successor operator of the .ORG registry.”

The speed and secrecy of the proposed sale cast doubt on PIR’s ability to maintain the level of service it has provided to nonprofit registrants in the past once it becomes a privately owned, for-profit concern. As a newly-formed entity, Ethos Capital has no track record of operating in the public interest. We also know little to nothing about Ethos’s investors, their goals, and whether those goals are compatible with the charge ICANN gave to PIR at its founding. In particular, we are concerned that PIR may wield the threat of domain suspension to influence the political, social, religious, journalistic, or personal expression of .ORG registrants and their users at the request of corporations or governments. And to all of the nonprofit registrants who cannot readily switch domains, PIR will have no accountability once its links to ISOC are severed.

The vague representations Ethos and PIR have made to date about accountability and stewardship are woefully insufficient to earn the trust of the .ORG community. The .ORG registry agreement should not come under Ethos’s control without the company first earning that trust. This requires transparency, as you have requested. It also requires specific, legally binding commitments to safeguard the rights of NGOs and other non-commercial registrants against financial exploitation and arbitrary censorship. We stand ready to help in defining those commitments. If PIR is unable or unwilling to make such commitments before completing its change of control, ICANN should exercise its right under Section 7.5 of the Registry Agreement to withhold consent to that change in control, terminate the Agreement, and begin a process to find a capable and trustworthy steward of the .ORG domain.

Very truly yours,



Cindy Cohn, Executive Director
Mitchell L. Stoltz, Senior Staff Attorney
Cara Gagliano, Staff Attorney
ELECTRONIC FRONTIER FOUNDATION

Internet Society
Attn: Andrew Sullivan, President and CEO
11710 Plaza America Drive, Suite 400
Reston, VA 20190

Dear Mr. Sullivan,

We urge you to stop the sale of the Public Interest Registry (PIR) to Ethos Capital.

Non-governmental organizations all over the world rely on the .ORG top-level domain. Decisions affecting .ORG must be made with the consultation of the NGO community, overseen by a trusted community leader. If the Internet Society (ISOC) can no longer be that leader, it should work with the NGO community and the Internet Corporation for Assigned Names and Numbers (ICANN) to find an appropriate replacement.

The 2019 .ORG Registry Agreement represents a significant departure from .ORG's 34-year history. It gives the registry the power to make several policy decisions that would be detrimental to the .ORG community:

- **The power to raise .ORG registration fees without the approval of ICANN or the .ORG community.** A .ORG price hike would put many cash-strapped NGOs in the difficult position of either paying the increased fees or losing the legitimacy and brand recognition of a .ORG domain.
- **The power to develop and implement Rights Protection Mechanisms unilaterally, without consulting the .ORG community.** If such mechanisms are not carefully crafted in collaboration with the NGO community, they risk censoring completely legal nonprofit activities.
- **The power to implement processes to suspend domain names based on accusations of “activity contrary to applicable law.”** The .ORG registry should not implement such processes without understanding how state actors frequently target NGOs with allegations of illegal activity.

A registry could abuse these powers to do significant harm to the global NGO sector, intentionally or not. We cannot afford to put them into the hands of a private equity firm that has not earned the trust of the NGO community. .ORG must be managed by a leader that puts the needs of NGOs over profits.

When ISOC originally proposed transferring management of .ORG to PIR in 2002, ISOC's then President and CEO Lynn St. Amour promised that .ORG would continue to be driven by the NGO community—in her words, PIR would “draw upon the resources of ISOC's

extended global network to drive policy and management.” As long-time members of that global network, we insist that you keep that promise.

Select signers:

Access Now	Front Line Defenders	Open Society Foundations
America's Service Commissions	German Foundation for Data Protection	Open Technology Institute
American Alliance of Museums	Girl Scouts of the USA	Oxfam
American Council on Exercise	Greenpeace	Palante
American Federation of Musicians of the U.S. and Canada	Gulf Centre for Human Rights	Philippine Human Rights Information Center
American Physical Society	Human Rights Watch	Public Citizen
American Society of Association Executives	HURIDOCS	Public Knowledge
April	Integrity Watch Afghanistan	Public Library of Science (PLOS)
Association of Junior Leagues International, Inc.	Internet Archive	R Street Institute
Center for Internet and Human Rights	Internet Policy Observatory Pakistan	Redes Ayuda
Code for America	Internet Sans Frontières	Sierra Club
Communications Workers of America	Internet Society Jakarta Chapter	TechSoup
Consumer Reports	Internet Society Netherlands Chapter	TEDIC NGO
Creative Commons	Jobs With Justice	Telecommunities Canada
Crisis Text Line	Karisma Foundation	The Association of Flight Attendants-CWA (AFA)
Derechos Digitales	League of Women Voters	The Union of Concerned Scientists
DoSomething.org	Meals on Wheels America	Transparency International (Germany)
Electronic Privacy Information Center	Media Foundation for West Africa	Ushahidi Inc.
European Center for Not-for-Profit Law Stichting (ECNL)	Mennonite Central Committee	VolunteerMatch
European Climate Foundation	MoveOn	Volunteers of America
Farm Aid	Nat'l Conference on Public Employee Retirement	Web Foundation
Fédération FDN	National Council of Nonprofits	Wikimedia Foundation
Feeding America	NTEN	YMCA of the USA
Fight for the Future	OCANDS	Youth and Philanthropy Initiative (YPI) Canada
Free Software Foundation	Open Knowledge Foundation	YWCA USA

Complete List of Organizational Signers

350.org
50by40.org
A Blessing to One Another
A Bunch of Hacks
A New Beginning Animal Rescue
A1K.org
Access Now
Affiliation of Multicultural Societies and Service Agencies of British Columbia
African Academic Network on Internet Policy
African Freedom of Expression Exchange (AFEX).
AfroLeadership
Agaric Tech Cooperative
Agile France
Albertine Watchdog
All Faiths
Allegheny RiverStone Center for the Arts
Alliance for Morris County Parks
Alternatives-et-Autogestion.org
Alternatives, Inc
America's Service Commissions
American Alliance of Museums
American Bible Society
American Council on Exercise
American Federation of Musicians of the United States and Canada
American Physical Society
American Political Science Association
American Society of Association Executives
Anarchist Group Amsterdam
Ann Martin Center
APpeas Associação Portuguesa de promoção do envelhecimento ativo e saudável
April
Aquilenet
Arab American Association of New York (AAANY)
ARTabilityAZ
arXiv.org
Aspiration
Association Artistique Alexandre Roubtzoff
Association for the Advancement of Sustainability in Higher Education (AASHE)
Association of Junior Leagues International, Inc.
Astra Labs
ASUTIC (Senegal ICT Users Association)
Auroville Foundation
Austin Baroque Orchestra
Australian Play, Imagination, and Learning Institute
Autimatisering
AvaCon
AvRM
Bangladesh NGOs Network for Radio and Communication(BNNRC)
Barracon Digital
Basic Internet Foundation
Battle of Homestead Foundation
Bay Area Mashers
Berkeley Institute for Free Speech Online
Better Future for All
Bike Walk Montana
Blueprint for Free Speech
Bridgewell Inc
Bring Your Own Ideas LTD
British Columbia Aviation Council
Business & Human Rights Resource Centre
C4 Atlanta
California Association of Nonprofits (CalNonprofits)
Capital Region Community Foundation
Cargografias.org
CASA New Orleans
Center for Digital Resilience
Center for Innovative Thinking, Inc
Center for Internet and Human Rights
Centro de Documentación en Derechos Humanos "Segundo Montes Mozo S.J." (CSMM)
Centro Latinoamericano de Investigaciones Sobre Internet
Centrum Cyfrowe Foundation
Chaotikum e.V.
Chestnut Creek School of the Arts
Child Saving Institute, Inc.
Children's Alliance of Montana
Children's Law Center Inc
Chilliwack Arts & Cultural Centre Society
Chordoma Foundation
Circus Freaks
Cita Press
City of Anacortes
CiviCRM
Civllsphere
Clever Octopus Inc
Clinton-Gratiot Habitat for Humanity ReStore
CN Guidance and Counseling Services
Co-op Source
Code for America
Codeando Mexico
Codeberg e.V.
Colorado Nonprofit Association
Communications Workers of America
Communities United Against Police Brutality
Community Action Center
Community Tech Network
Completely KIDS
Computer Aid International
concordion.org
Connecticut Community Nonprofit Alliance
Consumer Action
Consumer Reports
Council of Michigan Foundations
Coworker.org
Creative Commons
Crisis Text Line
Cybertelecom
Cycle On Hawaii
Daily Bread Food Bank
daltonbookclub.org
Daniel 2:28, Inc.
Datenschutzraum e.V.
Defending Rights & Dissent
Demand Progress Education Fund
Derechos Digitales
Design Action Collective
Digital Empowerment Foundation
Digital Rights Foundation, Pakistan
Digital Rights Watch
Digital Society School
Digitale Gesellschaft
Dioamore.org
Domain Name Rights Coalition
DoSomething.org
Downtown Aurora Visual Arts
Drayton Avenue Cooperative Preschool
DroidWiki.org
Droit et Justice
Dutch Virtual Reality Foundation

Eastern Orthodox Committee on Scouting
ECO
Ecumenical Council of Bishops and Apostolic Leadership
EDRi
EL SPACE
Electronic Frontier Finland
Electronic Frontier Foundation
Electronic Privacy Information Center
Elypia CIC
Empower Success Corps
epicenter.works
Erinyes.org.au
Erzsébet: The Opera
Esperanto.org
EU.org
European Center for Not-for-Profit Law Stichting (ECNL)
European Climate Foundation
European Institute of Golf Course Architects
Executive Service Corps of the United States
Fablab LCube
Family Residences and Essential Enterprises, Inc
Farm Aid
FDN
Fédération FDN
Feeding America
Fight for the Future
FIRE - The Foundation for Individual Rights in Education
Fondation Jaluo Du Congo/RDC (FOJAC)
Fondation Litteraire Fleur de Lys
Form & Function Digital Co-operative
Fourth Estate
Free Expression Myanmar
Free Software Foundation
freeCodeCamp.org
Freie Software Freunde e. V.
Front Line Defenders
FrOSCon e.V.
fundación Via Libre
Funding the Next Generation
Galveston Urban Ministries
Gateway Environmental Initiative
Geany e.V. Association
Geek's Home
GenLit.org
GeoCommunities

German Foundation for Data Protection
Gestalt Institute of the Gulf Coast
Girl Scouts of the USA
GivelInternet.org
Global Care Impact
Global Forum for Media Development (GFMD)
GNOME Foundation
Gökova Akyaka'yı Sevenler Derneği
Good4Trust.org
GrantStation
GreatFire.org
Greenpeace
Gulf Centre for Human Rights
Habilitation Information Vocation & Education
Hackerspace Istanbul
Harmonized Initiatives of Media for the Spread of Good Nutrition in Region 8
Heard Museum
Holistic Ministry of Children of the Horn of Africa
Holy Name Housing Corporation
Hope 24/7
Hopelink
Hospice Help Foundation
Hostingvereniging Soleus
House of Mercy
Huerto Roma Verde, La Cuadra genera ciudad A.C.
Human Rights Measurement Initiative
Humanitarian FOSS Project
Humanitarian Press Foundation, Yemen
HURIDOCs
i freedom Uganda Network
ICT Watch - Indonesia
Ideen Hoch Drei e.V
Immigrant Rights Action
Immigrant Solidarity DuPage
Immunize Nevada
Independent Sector
Index on Censorship
Indybay
Information Ecology
Initiative für Netzfreiheit
Integrity Watch Afghanistan
Interaction International
Interfaith Cincy
International Trade Union Confederation (ITUC)

Internet Archive
Internet of Ownership
Internet Policy Observatory
Pakistan
Internet Sans Frontières
Internet Society Jakarta Chapter
Internet Society Netherlands Chapter
Internet Systems Consortium
IO Cooperative Inc.
ION Medical Safety
Ionic 6
Iron Work Farm in Acton, Inc.
IT for Change
Jennifer Ann's Group
Job Connection, Inc
Jobs With Justice
JUMP Math
Kalvos & Damian's New Music Bazaar
Karisma Foundation
Kentucky Nonprofit Network
Killeen Lodge #1125 A.F. & A.M.
KnowledgeFlow Cybersafety Foundation
LA SEMILLA
LA Tech4Good
Learn Nigeria Laws
Liberty and Peace NOW! Human Rights Reporters
LibreFoodPantry
Life Transformation for Africa Initiative
Link Centre
LinuxFr
Liquid Legal Institute e.V.
Little Brothers Friends of the Elderly, San Francisco
Livermore Pride
LUX Center for the Arts
Main Street Productions, Inc. dba the Westfield Playhouse
MaineShare
Maison des utilisateurs de Logiciels Libres de Montréal
Majal.org
MakeKnowledge
Manchester Acupuncture Studio
MapLight
MariaDB Foundation
Mary McDowell Friends School
MasterNewMedia.org
Meals on Wheels America
Media Alliance
Media Foundation for West Africa

Members of Churches of Christ
for Scouting
Memphis Leadership Foundation
Mennonite Central Committee
Message Agency
Metamath
MidwayUSA Foundation
Minnesota Council of Nonprofits
MMD Gira ubukire
Modern Wizard Quarterly
Montana Afterschool Alliance
Montana Federation of Public
Employees (MFPE)
Montana Independent Living
Project
Montana Nonprofit Association
Multnomah County Library
Myanmar ICT for Development
Organisation
nadir.org
National Conference on Public
Employee Retirement Systems
National Council of Nonprofits
National Human Services
Assembly
National Voluntary Organizations
Active in Disaster
Nederlandse Vereniging voor
Veganisme (Dutch Vegan
Society)
NEEMFest Productions
Neponset River Watershed
Association
New Jersey Association of Mental
Health and Addiction Agencies,
Inc.
New York Avant-Garde Festival
Archive Site
New York Council of Nonprofits
Next in Nonprofits
Ngetha Media Association for
Peace (NMAP)
NICVA
Niko Niko Taishi
Nonprofit New York
North Carolina Center for
Nonprofits
North Carolina Justice Center
North Dakota Association of
Nonprofit Organizations
North Shore Child & Family
Guidance Center
Northbridge Technology Alliance
Northwest Progressive Institute
Nouveaux Voisins

NTEN
O Foundation
OCANDS
Odorheiu Secuiesc Community
Foundation
Ohev Sholom Talmud Torah
Congregation
Ökostadt Rhein-Neckar e.V.
OMACAN
Ontario Nonprofit Network
Open Aid Alliance
Open Knowledge Foundation
Open MIC (Open Media and
Information Companies Initiative)
Open Society Foundations
Open Source Initiative
Open Source Matters, Inc.
Open State Foundation
Open Technology Institute
openinverter.org
Opportunity Resource Fund
Our First Right
Oxfam
Özgür Yazılım Derneği
P.R.A.Y. Publishing
p≡p foundation
Padirac Innovation
Palante Technology Cooperative
Paleoaeie.org
Parinux
Participatory Budgeting Project
Pastoralists Indigenous Non
Governmental Organization's
(PINGO's) Forum
PATH North Dakota, Inc.
Patterson School Foundation
PDX Privacy
People For People
Pesticide Action Network North
America
Philadelphia Recorder Society
Philippine Human Rights
Information Center
Phoenix Rising Equine Rescue &
Rehabilitation
Pinelands Preservation Alliance
Pirate Parties International
Piratpartiet Sverige
Platoniq
Policy Research and Innovation
Premium Traffic Limited
Presentation House Theatre
Project WET Foundation
Providers' Council

Proyecto sobre Organización,
Desarrollo, Educación e
Investigación (PODER)
Public Citizen
Public Knowledge
Public Library of Science (PLOS)
Qurium Media Foundation
R Street Institute
Radically Open Security
Radio Free
Rainforest Action Network
Redes Ayuda
RedesAyuda
Refugee Women's Network
Regular Baptist Ministries
Replicant
Review.org, LLC
ritimo
River Cities Humane Society for
Cats
Roadrunner Food Bank, Inc.
SafeHouse Denver
Salam Academy
Salt Works Student Ministries
San Francisco Lyric Chorus
San Francisco Public Health
Foundation
San Juan Community Matters
SANE Project
School on Wheels
Second Harvest Asia
Second Harvest Japan
SELFHTML e.V.
Shifter
Side by Side, Inc
Sierra Club
Simple Machines
Skiftet
Sociality - Cooperative for Digital
Communication Greece
Society for Nonprofits
Softcatalà
Software For Good
Software Freedom Law Center
India
South Florida Tech For Seniors
Southern Environmental Law
Center
Springfield Area Arts Council
Stajl IT
State Theatre, Inc.
STEPSABQ.org
Stiftung Albumin-Carrier-Therapie
Stin Priza Coop

Stratosphere Research
Laboratory
Stuart Center
Sud-Ouest.org
Sugarloaf: The North Shore
Stewardship Association
Sursiendo, Comunicación y
Cultura Digital
Sustainable Fisheries Partnership
Foundation
Talking Talons Youth Leadership
TechSoup
Tecker International LLC
TEDIC NGO
Telecommunities Canada
Telecommunities Canada
Texas Criminal Justice Coalition
The Apache Software Foundation
The Association of Flight
Attendants-CWA (AFA)
The Bioscience Resource Project
The Boys' Latin School of MD
The Centre for Developmental
Neurobiology
The Children's Treehouse
Foundation
The Document Foundation
The Environmental Center
The Henry Ford
The Humane Society of Elmore
County
The Inetta Fund
The IO Foundation
The League of Women Voters of
the United States
The Los Haro Project
The MRC Centre for
Neurodevelopmental Disorders
The Oxalosis & Hyperoxaluria
Foundation
The Parallax
The Tor Project
The Union for Contemporary Art
The Union of Concerned
Scientists
Theosophical Society in Seattle
Thetford Academy
Thibodaux Playhouse, Inc
ThinkShout
Thirring Institute for Applied
Gravitational Research
Tioga Opportunities, Inc
To'nihaiyilya- Growing Our
Dreams
Together SC

Trans Lifeline
Transnational Institute
Transparency International
(Germany)
Tulsa Hub Syndicate
Tupelo Arts Council
Tutanota
United Methodist
Communications
United Way of Butte and
Anaconda
United Way of the Lewis and
Clark Area
Ushahidi Inc.
Videre Est Credere
VolunteerMatch
Volunteers of America
Waag | Technology & Society
Washington Trails Association
Watcan Foundation
Web Foundation
West Hartford Symphony
Orchestra of West Hartford, CT
West Virginia Nonprofit
Association
Wikimedia Foundation
WikiReal
Win Without War
WITNESS
Women LISTEN, Inc.
WonderArts Vermont
Wooden Shoe Books
Woolsack
Xpdojo.org
YMCA of the USA
Yinternet.org
YODET
Yonkers Community Action
Program, Inc
Your Digital Rights
Youth and Philanthropy Initiative
(YPI) Canada
YWCA USA
Zanmi Lakay
Zazim
Zir Chemed
_artundweise kunst- und
denkraum