

May 6, 2014

Via email to russ.weinstein@icann.org

Mr. Russ Weinstein
Senior Manager, Generic Domains Division Operations
Mr. Allen Grogan
Chief Contracting Counsel
Internet Corporation For Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536, USA

Re: Auction Mechanism For Resolving Indirect Contention.

Dear Messrs. Weinstein and Grogan:

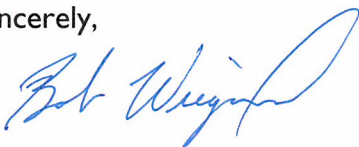
We write to formally request that ICANN publish its proposed auction mechanism for resolving indirect contention sets with ample opportunity for public comment from the community.

We are confident that a twenty-one day public comment period and a corresponding reply comment period are feasible, despite the June 4, 2014 inaugural auction date, given that all auctions involving indirect contention purposefully appear at the end of the auction schedule. In addition, a public comment and reply period are necessary in light of the degree of speculation in Singapore, particularly among affected applicants, surrounding how auctions involving indirect contention might proceed.

It is our belief that the contours of the proposed auction mechanism will have a profound impact upon individual applicants who are indirectly in contention with one another. Specifically, although the Guidebook alludes to a single auction for each contention set, it does not clarify whether either vertical contention (meaning identical strings) or horizontal contention (meaning confusingly similar strings) might be resolved as a matter of priority.

Accordingly, we respectfully request that ICANN provide the community with a meaningful opportunity to submit comments on the proposed auction mechanism for resolving indirect contention.

Sincerely,

A handwritten signature in blue ink that reads "Bob Wiegand".

Bob Wiegand
Senior Vice President
Web.com Group, Inc.