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SENT VIA E-MAIL AND BY U.S. MAIL

July 5, 2001
Christmas Island Date: 6 July 2001

Louis Touton, Esq.
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina Del Rey, CA 90292-6601

**Re: IANA's Procedure for Reflecting Correct ccTLD
Designated Manager; ICANN's Failure to Reflect Proper
Contact Parties for <.cx> Top Level Domain Name; Your
Letter of Even Date**

Dear Mr. Touton:

Thank you for your e-mail message of even date advising that ICANN, through the Internet Assigned Numbers Authority ("IANA") function, initiated the nameserver changes Dot CX Limited ("Dot CX") requested on June 28, 2001 for the <.cx> country code top-level domain (the "CX ccTLD"). Because ICANN administers the IANA function, we use "ICANN" and "IANA" synonymously herein.

You also advise that IANA will not correct the improper listing of the sponsoring organization, administrative contact, and technical contact for the CX ccTLD in IANA Root-Zone Whois Information database (the "IANA Database") because IANA is "continu[ing] its review of the pending redelegation request". We are pleased the IANA is reviewing Dot CX's requests, but we are somewhat confused by your advice.

Dot CX notified IANA over a year ago that Dot CX had assumed responsibility for the management of the CX ccTLD pursuant to a formal assignment and delegation agreement between Planet Three (*i.e.*, the former designated manager for the CX ccTLD) and it. Then, Dot CX delivered to you several letters advising of the contact information for Dot CX. In total, Dot CX made six (6) formal requests to IANA; however, IANA did not respond to any of Dot CX's requests.

We would be grateful if you would be so kind as to advise in writing the following information:

1. What is IANA's formal procedure for causing the IANA

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Database to reflect a new ccTLD designated manager trustee?

2. What documents govern IANA's decision whether to recognize a new ccTLD designated manager?
3. What rights does a designated manager, or prospective designated manager, have with respect to IANA's ccTLD designated manager review process?
4. When did IANA begin its "review of the pending [CX ccTLD] redelegation request"?
5. What procedure and analysis has IANA undertaken, specifically, in its "review of the pending [CX ccTLD] redelegation request"?
6. What individuals and entities are, and have been, involved in IANA's consideration of Dot CX's many requests to IANA?
7. Why have neither IANA nor any other party contacted Dot CX about such IANA "review of the pending redelegation request"?
8. Has IANA received from any party any objection to Dot CX being recognized as the designated manager for the CX ccTLD?

Finally, and most importantly, please advise as to what process must occur before ICANN will recognize Dot CX in its IANA Database.

We would appreciate a written response to this letter by Thursday, 19 July 2001.

In any event, Dot CX reserves all rights, claims, and causes of action against ICANN and all third parties relating to the CX ccTLD, including its position that no "redelegation" need occur because transfer of management and responsibility for the CX TLD trusteeship to Dot CX already occurred over a year ago.

Should you have any questions, please do not hesitate to contact me.

Very Truly Yours,

NEWMAN & NEWMAN,
ATTORNEYS AT LAW, LLP



Derek A. Newman