



**dot cx Limited - ACN 091 843 417**

A Company Limited by Guarantee

Neighborhood Centre

Murray Road, Poon Saan

Christmas Island

Indian Ocean, 6798

+ 61 (0)8 9164 8088

+ 61 (0)8 9164 8879

SENT VIA HAND DELIVERY AND REGISTERED POST

Friday, July 14, 2000

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

**Re: Transfer of Designated Manager Trusteeship for <.cx> TLD**

Dear Mr. Touton:

In accordance with RFC 1591 and in recognition of the Internet Assigned Numbers Authority's ("IANA") responsibility for the overall coordination and management of the Domain Name System, Dot CX Limited hereby informs IANA that the designated manager trusteeship for the <.cx> top level domain is transferred, effective immediately, from Planet Three Limited ("PTL") to Dot CX Limited ("CX").

#### **Transfer of Designated Manager Trusteeship from PTL to CX**

In a memorandum of understanding dated January 20, 2000 PTL agreed to relinquish its active role as trustee of the <.cx> ccTLD. CX has agreed to perform all obligations of PTL as Designated Manager of the <.cx> top level domain and PTL has in turn agreed that CX be entitled to exercise the rights that CX enjoys as Designated Manager. Accordingly, PTL has assigned all rights and delegated all duties to CX that PTL has with respect to the <.cx> top level domain, pursuant to all relevant agreements and understandings between PTL and IANA. CX has assumed all responsibilities and duties as Designated Manager of the <.cx> top level domain and is actively ensuring the <.cx> ccTLD is administered in accordance with RFC 1591, and such other policy guidelines and practices that IANA and ICANN have advised from time to time. This transfer of Designated Manager trusteeship has been mutually agreed upon by PTL and CX and the parties have worked amicably and efficiently to effect the smooth transition of trusteeship.

#### **Dot CX Limited**

CX has access to the technical capability, financial resources and legal and policy expertise to both serve as a trustee for and responsibly manage the <.cx> top level domain in an appropriate and responsible manor.

#### **Technical Capability**

CX is well positioned to handle all responsibilities of Designated Manager. CX has access to the infrastructure and skills necessary to fulfill its obligations, including:

- experience in the management of assigning domain names, the delegation of sub-domains and the operation of name servers with technical competence;
- is familiar with the practice for the keeping of the central Internet Root ("IR") or other higher level domain manager advised of the status of the domain;
- is committed to having the necessary resources to respond to requests in a timely manner; has the necessary skills in order to operate the database with accuracy, robustness, and resilience

- that has IP connectivity to the Internet and this can be easily checked for operational status and database accuracy by the IR and IANA.

### **Internet Policy Interests**

CX has reviewed a number of documents relating to the responsible administration of ccTLD's, including the WIPO and GAC recommendations. CX acknowledges that it has responsibilities beyond merely serving the local Internet Community and ensuring technical stability of the cx ccTLD. To this end CX is actively participating in the ICANN process and will develop policies which are consistent with its responsibilities to both the local and the global Internet Communities.

### **Responsibility to Community**

CX has been organized and incorporated in such a way to assist and benefit the Christmas Island Internet Community in its efforts to participate actively in the information economy. It was formed as a Company Limited by Guarantee under the laws of the Commonwealth of Australia. The company was set as legal trustee of a trust established by, and for the benefit of the community of Christmas Island Christmas Island Information Economy Development (the "Trust"). The purpose of the Trust is to underwrite private sector activities aimed at developing the information technology infrastructure on Christmas Island, fund information technology associated training and development programs, develop the information economy on Christmas Island and fund related activities which will benefit Christmas Island community in a substantive way. Under its Constitution, CX's sole purpose is to act as trustee of the Trust and the <.cx> ccTLD.

CX and believes that the management structure, objects and goals of CX are consistent with the principals on which the DNS was founded and has been historically managed. CX has, and will continue to seek the views of interested parties and will responsibly address any issues that may arise from time to time. The commitment and objects of CX ensure that both the Christmas Island community and the global Internet community will benefit from CX's role as trustee. CX has received widespread community support for the its role as trustee and sponsoring organisation, including the directly elected and representative local government, all major stakeholders and identifiable community groups on Christmas Island, including the:

- Shire of Christmas Island
- Christmas Island Chamber of Commerce;
- Chinese Literacy Association;
- Union of Christmas Island Workers;
- Christmas Island Islamic Counsel;
- Christmas Island District High School;
- Christmas Island Tourism Association;
- Indian Ocean Communications (the sole local ISP);
- Christmas Island Women's Association; and
- Indian Ocean Group Training Association.

These organisations not only support but a number are involved in serving as directors of the Trust.

### **Transition from PTL to CX**

Under CX's management the <.cx> top level domain will continue to operate in compliance with IANA regulations, and will be subject to the laws that govern Christmas Island. I understand you have met with our legal counsel and a member of our policy advisory board and have been provided with copies the relevant documentation and letters of support from the relevant local community. Accordingly, IANA should recognize PTL's relinquishment and CX's assumption of the rights and duties with respect to the <.cx> top level domain, and IANA

should immediately correct its database to indicate that CX has appropriately assumed the role of trustee of the <.cx> top level domain.

Below is the necessary contact information for IANA's files and public record:

Trustee and Sponsoring Organisation for the cx ccTLD  
Dot CX Limited (ACN 091 843 417)  
Neighborhood Centre  
Murray Road, Poon Saan  
Christmas Island  
Indian Ocean, 6798  
+ 61 (0)8.9164.8808

Administrative Contact: Alan Fealy - Managing Director Dot CX Limited  
[alan.fealy@dot.cx](mailto:alan.fealy@dot.cx)  
Secretariat : Sue Lam - Dot CX Limited  
[sue.lam@dot.cx](mailto:sue.lam@dot.cx)

Technical Contact: Garth Miller - Chair Dot CX Technical Advisory Board  
eNIC Cocos (Keeling) Islands Pty. Limited  
Pax Quarters Three, West Island  
Cocos (Keeling) Islands  
Indian Ocean  
+61 (0) 8 9162 7644  
[garth.miller@dot.cx](mailto:garth.miller@dot.cx)

Please contact me if you have any questions or concerns or if any other information is required to effectuate this transition. Dot CX has suspended registrations in the cx ccTLD in order to ensure a smooth transition to the CX shared registry system and to conduct a thorough review of the policies for the cx ccTLD. Given that the assignment of trustee duties and delegation falls within the requirements of RFC 1591, if CX does not receive a response we assume that this transfer has been recognized by IANA.

Yours faithfully,

Alan Fealy  
Director, Dot CX Limited  
[alan.fealy@dot.cx](mailto:alan.fealy@dot.cx)