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18 February 2022

VIA E-MAIL

The ICANN Board of Directors
c/o Mr. Maarten Botterman, Chair
The Accountability Mechanisms Committee of the ICANN Board
c/o Ms. Becky Burr

Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094
maarten.botterman@board.icann.org
bburr@hwglaw.com

Re: ICANN Board Resolutions 2022.01.16.12 – 2022.01.16.15

Dear Mr. Botterman, Ms. Burr, and Members of the ICANN Board:

We write on behalf of Altanovo Domains Limited (**Altanovo**), f/k/a Afilias Domains No. 3 Limited (**Afilias**), to follow up on our letter to you dated 11 February 2022 (as corrected on 13 February 2022).

After seeing the transcript of VeriSign, Inc.'s (**Verisign**) Q4 Earnings Call on 10 February 2022 (quoted at page 8 of our 11 February letter), we reviewed Verisign's Annual Report (i.e., its 10-K Statement submitted to the U.S. Securities and Exchange Commission ("**SEC**")) dated 19 February 2021. We note that Verisign stated in connection with the *Afilias v. ICANN* IRP arbitration proceeding:

[T]he current arbitration proceeding against ICANN ***challenging the validity of ICANN's award of the .web gTLD to us [i.e., Verisign]*** could adversely affect our ability to operate the .web gTLD.¹

It is difficult to believe that Verisign—which, as you are well aware, did not submit an application for .WEB—would have made this statement in an SEC filing, without some factual foundation. In light of the foregoing statement, we request ICANN's immediate confirmation as to whether at any time ICANN has awarded the .WEB gTLD to Verisign,

¹ VeriSign, Inc., Annual Report (Form 10-K) (19 Feb. 2021), p. 16 (emphasis added), available at <https://investor.verisign.com/static-files/9f053f1f-a551-4abe-b817-bdb5d4ff874f>.

or has advised Verisign that it will award the .WEB gTLD to Verisign, and, if so, when such an award was made or when such advice was provided. If the above statement is incorrect, we request ICANN to confirm as much.

Altanovo reserves all of its rights and remedies in all available fora whether within or outside of the United States of America in regards to this matter.

Sincerely,



Arif Hyder Ali
Counsel for Altanovo Domains Limited,
f/k/a Afilias Domains No. 3 Limited

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