



May 31, 2005

Mr. Kurt Pritz  
Vice President, Business Operations  
ICANN  
4676 Admiralty Way, Suite 330  
Marina del Ray, CA 90292

Dear Mr. Pritz,

I am writing you in response to some recent discussions in the registry/registrar community arising from the approval of Iron Mountain Intellectual Property Management, Inc. (“IMIPM”) as an ICANN accredited registrar. I understand that a few members of the community have expressed concern that IMIPM’s current role as an escrow services provider and future role as an active registrar could result in inappropriate sharing or use of data within IMIPM that would allow IMIPM a competitive advantage vis-à-vis other registrars.

IMIPM acts as a neutral third-party in the protection and storage of information. IMIPM maintains separate service delivery teams: one – located in Atlanta, GA, USA - supporting escrow services and one located in Dulles, VA, USA – supporting domain services. Access to client information is physically and/or logically restricted to the staff directly responsible for service delivery. These separate and geographically diverse organizations along with information access restrictions create an effective internal control that ensures the satisfaction of all contractual obligations of IMIPM. Our recent ICANN accreditation supports our belief that we are in full compliance with all registry/registrar agreement provisions.

Additionally IMIPM is a wholly owned subsidiary of Iron Mountain, Incorporated (“Iron Mountain”). Iron Mountain is the global leader in providing secure business information storage and protection services. We believe that domain name records are simply one type of record that we are protecting and storing for businesses worldwide. In a very real sense, Iron Mountain’s position as the global leader in providing these services is wholly dependent upon Iron Mountain’s credibility as a trusted service provider. Iron Mountain values its reputation for integrity. Integrity is the basis upon which Iron Mountain has built all of its business and I can personally assure you and the entire registry/registrar community that IMIPM would never take any action with escrowed data that would compromise the confidentiality of that data for any reason.

I hope this letter provides beneficial insight to members of the registry/registrar community that we have joined and addresses the concerns that a few members of this community have raised. IMIPM looks forward to working cooperatively within the ICANN community.



Please post this letter on ICANN's website to help IMIPM address any and all concerns that have been raised relevant to IMIPM's accreditation as an ICANN registrar. Please let me know if you require any additional information or if I or any other member of the IMIPM team can be of further assistance in addressing these concerns.

Best regards,

Jeffrey Johnson  
Senior Vice President and General Manager  
Iron Mountain Intellectual Property Management, Inc.

CC: Ms. Tina Dam, Chief gTLD Registry Liaison  
Ms. Karen Lentz, gTLD Registry Liaison  
Mr. Tim Cole, Chief Registry Liaison