

Dr. Paul Twomey
ICANN
4676 Admiralty Way
Suite 330
Marina del Rey, CA 90212

Re: Sentan request to amend the .net evaluation process

Dear Dr. Twomey,

I wanted to take this opportunity to give you the benefit of our comments and concerns regarding the letter of April 4, 2005 to you from Mr. Richard Tindal, CEO of Sentan Registry Services, Inc. ("Sentan"), a disappointed bidder in ICANN's .net RFP process (the "Sentan letter"). It is most unfortunate that Sentan, in an attempt to overcome the deficiencies of its own proposal, has found it necessary to launch a baseless, unsubstantiated attack on the findings of ICANN's designated independent evaluator, Telcordia Technologies, Inc. ("Telcordia"). Sentan's self-serving letter is not credible and certainly has presented no justifiable reason for either reconsidering or disturbing Telcordia's application rankings, as found in its report entitled, *ICANN .net RFP Evaluation, Final Report* ("Final Report").

Perhaps the most curious aspect of the Sentan letter is that it criticizes Telcordia's evaluation of VeriSign's application, even though Sentan could not have known the full contents of that application, as they were strictly confidential and known only by the evaluators. Without a basis on which to assess Telcordia's comparative analysis of the Sentan and VeriSign proposals, Sentan simply speculates about what that basis may have been, applies these imagined facts to its own distorted reading of the RFP, and then substitutes its own biased judgment for that of the Telcordia evaluators.

More particularly, Sentan attacks VeriSign's perfect score (under Section 2.6.1) with respect to the provision of contingency operations to insure the security and stability of the registry, asserting that "a fair scoring" would make Sentan's rating higher than VeriSign's. This assertion not only lacks any factual basis, but stands in the face of VeriSign's well-publicized track record of having delivered 100% resolution availability for 7 years, a record of stability and reliability unmatched by Sentan or any other registry operators.

Sentan also attacks VeriSign's purported past lack of policy compliance (under Section 2.7). The sole basis for this attack are allegations pulled out of context by Sentan from unrelated arbitration pleadings, which themselves were intended only to raise issues in litigation. No evidence has ever been presented with respect to those issues in any proceedings, and no findings were ever entered supporting Sentan's claims in the least.

Sentan next suggests that another operator should be designated for the .net registry based on undefined competitive considerations. Sentan does not offer any economic or financial analysis to support its claims, nor could it. Competition exists in both the registrar and registry marketplaces. Since ICANN undertook its role, what was a single registrar/registry has now become more than 400 competitive registrars and numerous competitive generic and country-code registries. In addition, ICANN has indicated that it is in the process of approving several new TLDs, with the result that there will soon be more than a dozen alternative TLD registry options for commercial registration.

Finally, Sentan criticizes VeriSign for failing to list (under Section 2.3a) in its .net response the benefits and burdens of its new services. Sentan ignores the fact that those services are substantially in use and the record of the benefits provide by the services speaks for itself, including the millions of Internet users who have availed themselves of such services. Now that Sentan is not the highest ranked applicant, Sentan is challenging the “equal treatment” and fairness of the process and calling for yet another change in the process in the form of opening an investigation and a reevaluation. The Sentan comments are nothing more than a disgruntled bidder attempting to manipulate the process.

We look forward to continuing to provide the highest quality .net service.

Sincerely,

X

Mark McLaughlin
Sr. Vice President and General Manager
VeriSign Naming and Directory Services

Cc: John O. Jeffrey
General Counsel, ICANN