



Reconsideration Request

1. Requestor Information

Name: Ivan Dario Castaño Perez

Address:

MinTIC
Edificio Murillo Toro - Cra. 8a Between calles 12 y 13

Zip Code: 111711 - Bogotá D.C. - Colombia

Email:

Phone Number (optional):

Contact Information Redacted

2. Request for Reconsideration of:

Board action/inaction

Staff action/inaction

3. Description of specific action you are seeking to have reconsidered.

ICANN Board meeting held on 15-May-2019 at which resolutions 2019.05.15.13 thru 2019.05.15.15 were approved.

4. Date of action/inaction:

15-May-2019

5. On what date did you become aware of the action or that action would not be taken?

The Colombia government did not become fully aware of this action/inaction by ICANN until 18-May-2019. Upon information and belief, the Resolutions and accompanying rationale were posted on the ICANN website on 17-May-2019.



6. Describe how you believe you are materially and adversely affected by the action or inaction:

The Colombia government believes that ICANN's rush to judgment in connection with the Amazon EU S.à r.l. applications materially and adversely impact it in the following several overarching areas. Hereinafter, when citing Amazon the Company we intend to reference Amazon.com, Inc., Amazon EU S.à r.l., Amazon Registry Services, and any other subsidiary or affiliate associated with the TLD applications in question.

1. Adverse impact on the rights of Amazonian communities and indigenous peoples:

In accordance with the Political Constitution of Colombia, the State recognizes and protects the ethnic and cultural diversity of the Nation (art.7), and fulfills its obligation to protect cultural and natural wealth (art.8). Also, the State recognizes the communal lands of the ethnic groups and the lands of protection as "inalienable, imprescriptible and indefeasible property" (art.63). For this reason, the Colombian government is committed to the preservation, protection and promotion of the rights of the indigenous peoples and the Amazonian communities, through the adoption of the necessary measures to guarantee the effectiveness of the rights of the communities.

In addition, ILO Convention No. 169 on Indigenous and Tribal Peoples in Independent Countries, of which Colombia is a State Party, establishes the obligation of States to take actions to protect indigenous peoples and "guarantee respect for their integrity." The treaty also provides that legislative or administrative measures that directly affect indigenous peoples must be consulted in good faith (art.6).

Therefore, the decision of the ICANN Board to prematurely conclude the negotiations, without having fully and adequately addressed the key aspects of the proposal of Amazon the Company, and its effects on the rights of the indigenous peoples of the country affects the responsibilities of the government of Colombia with the indigenous territories and communities of the Amazon of Colombia.

2. Economic and Commercial adverse impacts:

A top-level domain works, not just as a postal address, where the order or place where a name appears transmits different types of information about the delivery address, but also as a signpost, which provides information on what type of activity is really supposed to happen in that delivery address or below it.

A top-level domain sends a clear message about what kind of business one would expect to find under existing TLDs. From the commercial point of view, an own domain helps to create identity, promotes the image of the product, service or company on the internet and gives it an

additional value. For this reason, by granting the Amazon the Company the commercial exclusivity of the first level domain, the economic interests of the country are affected, because it limits the future possibilities of commercial incursion of the communities of the Amazon, through this name of global reach, which is intrinsically related to the territory they inhabit.

In this regard, ICANN's decision also directly affects the market capture of Amazonian products and, therefore, all of the biotrade, as well as the loyalty of customers who are already associated with the Amazonian market, avoiding the attraction and attracting potential customers and affecting the loyalty of current customers, with which the market for products of Amazonian origin already counts.

Likewise, from the approach of the country's policy for Economic and Environmental Sustainability to "produce conserving and preserving production", a negative impact is generated for the creation or incursion in an international market of local products through electronic commerce, whose opportunities they are restricted because the use of the name at the commercial level is limited exclusively to Amazon the Company. In this case, for example, the products that are the result of the zones where programs, projects and economic activities are being developed, such as "Corazón de la Amazonia", through which conflicts between environmental partners in protected areas are avoided, strategies of conservation in situ and in strategic ecosystems, they will not find a fair trade, but they will be subordinated to the juridical person of ".Amazon"

Consequently, ICANN's decision has broader implications on the country's public policy programs for the protection and development of the Colombian Amazon and, in particular, the National Sustainable Biotrade program, which is a strategy that seeks to take advantage of the benefits comparisons of the country in terms of its biodiversity, in order to facilitate the collective construction of sustainable businesses that enhance equity and social justice of the Amazonian communities.

These implications, derived from the decision of ICANN, limit the future possibilities regarding the competitive and sustainable development of products and services based on native biodiversity in a global economic context, and structurally, to the generation of wealth and opportunities through of its sustainable commercial use, and puts our Amazon companies at a clear disadvantage, for not being able to carry out a brand positioning of products originating from the Amazonian region through the use of a first level domain whose name identifies them.

3. Risk of confusion between geographical names and domain names - impossibility of using IP rights

The Amazon is one of the regions of Colombia with the greatest ethnic and linguistic diversity, in which several sociocultural complexes located in different areas are located. The Amazon also corresponds to the name of the largest department of Colombia with 110,000 square km with approximately 75,000 inhabitants until 2015. It is also a macro region that brings together 8 countries. In this sense, the Amazonian communities, and the indigenous peoples that are part of them, represent a great ethnic diversity in Colombia, as well as cultural expressions,

traditional knowledge and biodiversity.

The registration of domain names has important implications because it is an address that transcends the territorial and offers a global identification for all consumers in the world. The registration is granted to the first who requests it under the principle "first in time, first in law", However, it is still controversial that granting such domain may affect the rights of third parties such as intellectual property rights, rights of the personality or rights of geographical places.

The Amazonian peoples represent a great ethnic diversity in Colombia, as well as cultural expressions, traditional knowledge and biodiversity and the Government exerts its territorial sovereignty through the recognition of the region, the extension of Government programs, recognition of its inhabitants, a legal framework that protects its biodiversity, indigenous reserves

The main challenge of the Colombian Amazon is economic growth and development without threatening its wealth and natural, cultural and ethnic heritage. However, the granting of a gTLD domain to the company Amazon Inc. affects the interests, values and economic rights of indigenous communities, and of a region that is developing over time in global positioning through connectivity and commerce. electronic.

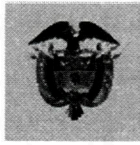
This is due to the notoriety acquired by a domain name that differentiates resources, products, services and values through the Internet and portals, and that will be exploited by a third party, establishing a risk of confusion by trying to link the products, services and content of the domain with the geographic location, limiting the possibility of the communities to use it for their own interest, taking advantage of the positioning with which the Amazonian worldview counts, and attributing characteristics that AMAZON does not have as an American company, to products that are not native to the Amazon region.

In this sense, when the word Amazon is treated to a reference in English of the Amazon region, a distorted perception of the consumer is generated in the linking of the products of the multinational with the population and geographical location, when there is no direct relationship or hint. In addition, a reputational risk of the region is generated, which may be affected by the company's misconduct.

In this case, it is also evident that the communities of the Amazon, its inhabitants and political and local leaders cannot make use of this domain name in the future, as would be the case of a brand or denomination of origin of an Amazon product. Intellectual property rights also enter into conflict with the domain name.

4. Adversely impacting the global multi-stakeholder model and preservation of a unified internet authoritative root.

In the area of Internet Governance, the Colombia government has actively supported and contributed to the global multi-stakeholder model. The Colombia government specifically



recognizes that the public and private sector partnership is the bedrock upon which the ICANN multi-stakeholder model is built. However, the ICANN Board decided to prematurely conclude negotiations between Amazon the Company, and the individual Member Countries of the Amazon Cooperation Treaty Organization (ACTO) based on its own self-imposed deadline. These actions directly undermined and threatened the legitimacy of the entire multi-stakeholder model to advance the commercial interests of a single company that already owns and operates over fifty other generic top-level domains.

The Colombia government would respectfully like to call ICANN's attention to the multiple sessions planned for the upcoming ICANN Policy Meeting in Marrakesh in which the topic of "alternative protocols" will be discussed. In fact, this is not the first time that this issue has been addressed at an ICANN regional meeting. While the Colombia government to date has offered no support to these alternative protocols in defense of the ICANN multi-stakeholder model and the unified root, ICANN's disregard of the Colombia government's legitimate concerns provides fuel to the fire for those interests seeking to undermine and/or replace the current multi-stakeholder model.

7. Describe how others may be adversely affected by the action or inaction, if you believe that this is a concern.

Upon information and belief, the Colombia government believes that other ACTO Member States that have been in in communication with ICANN in connection with this matter will also be adversely impacted by the action/inaction of ICANN. To be clear, this Reconsideration Request is being filed solely by the Colombia government and not on behalf of ACTO or any other Member State other than the Colombia government.

8. Detail of Board or Staff Action/Inaction – Required Information

The Colombia government respectfully submits that the ICANN Staff and Board, upon information and belief, failed to consider the detailed legal concerns raised in a communication to Amazon the Company in which the ICANN CEO, ICANN Board Chair, and ICANN GAC Chair were all copied. See Attachment A – Communication sent by Ivan Castano, Director IT Industry Development on 7-April-2019. Specifically, the Colombia government has been unable to find this communication listed on the ICANN public correspondence website or in any of cited references in the Resolution. Additionally, the Colombia government has not been able to review REFERENCE MATERIALS ATTACHMENT A & B cited in the Resolution. We would respectfully request that ICANN provide the community with a public link to this material at its earliest convenience.

Specification 13 Concerns



This communication by the Colombia government raised new and material issues in response to Amazon the Company's proposal to seek Specification 13 designation in connection with the AMAZON TLD extensions. While Amazon the Company has made references to operate the TLD as a "highly restrictive" brand, there was no Specification 13 designation/option available at the time of filing in 2012. We believe that Amazon the Company only recently made public its intention to seek Specification 13 designation in connection with the contested strings. In fact, we can find no reference to Specification 13 in the final IRP decision.

The ICANN Board appears to blindly accept Amazon the Company's representation that operating the contested string under a Specification 13 designation would be consistent with existing ICANN established best practice and would safeguard all parties' best interests. However, that is not the case as we tried to inform both ICANN and Amazon the Company in follow excerpt from our 7-April-2019 communication:

As only the trademark owner, its affiliates and licensees are permitted to use domain names in a Specification 13 (aka Brand) TLD, we cannot see how Amazon Inc's. proposal to permit ACTO members to be beneficial registrants of the domain names is acceptable under the existing ICANN registry contractual framework. While it appears that Amazon Inc. has tried to comply with the "letter" of Specification 13 by proposing to register these domain names in its name, controlling the name servers, and holding exclusively editorial control over the context appearing on these website, the fact remains that the ACTO members would be the beneficial registrants and thus violate the terms of Specification 13. Unless of course Amazon Inc. was under the false impression that ACTO members would be entering a "license" agreement to use these domain names.

As we have previously disclosed, the Colombian government has submitted a Documentary Information Disclosure Policy (DIDP) request with ICANN to see further clarification on this point. Hopefully, the timely provisioning of any documents might help clarify this potential fundamental disagreement between the parties.

As noted in the Colombia government communication of 7-April-2019, we had filed a DIDP with ICANN.Org seeking any documentation in connection with Specification 13 that would shed light on the proposed designation being sought by Amazon the Company considering their proposed PIC commitments. ICANN was unable to provide any additional document but was able reference that following fact which the Colombia government had previously cited in its communication:

Only Registry Operator, its Affiliates or Trademark Licensees are registrants of domain names in the TLD and control the DNS records associated with domain names at any level in the TLD;

Given that the ICANN Board specifically cited the "highly restricted" nature of the Amazon strings in its rationale associated with the Resolutions, the Colombia government believes that the ICANN community is required a "detailed explanations of the basis for decision" as set forth



in ICANN Bylaw Section 3.1. If ICANN.Org determines that Amazon the Company would not be permitted a Specification 13 designation based upon proposed multi-purpose use of the TLDs as proposed in their PIC Specification, then then ICANN Board should reconsider the basis of the Resolutions in question.

Security Issues Involving Concurrent Use of the .AMAZON TLDs

ACTO Member States, including the Colombia government, in some of their negotiations with Amazon the Company had discussed the potential joint ownership/control of the .AMAZON TLDs. However, in an attempt to negotiate in good faith, the Colombia government offered other governance structures for consideration by Amazon the Company. Specifically, in our 7-April-2019 communication we cited the concurrent use of the .SAS TLD. While this TLD appears to be used by two SAS trademark owners (see NIC.SAS), only one of them is designated as the Registry Operator according to ICANN's records, see <https://www.icann.org/resources/agreement/sas-2015-04-02-en>

In an apparent response to this issue raised by the Colombia government, Amazon the Company raised potential security and stability concerns regarding the joint control of the TLDs in question. However, Amazon the Company did not elaborate on the specific security and stability concerns it had and whether it might be possible to mitigate them. Clearly the .SAS TLD appears to be currently operated in a manner that does not give rise to security and stability concerns.

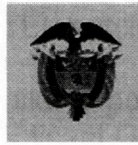
Unfortunately, it does not appear that the ICANN Board even consider this potential option in seeking to achieve a mutually agreeable resolution between the parties. Instead, the ICANN Board appears to have rushed to judgment in approving the last best offer put forth by Amazon the Company and their claims of security and stability concerns. The Colombia government believes this deficiency is heightened considering the ICANN Board's apparent reliance on the Specification 13 representation made by Amazon the Company. If Specification 13 is not a viable option as we have represented under current ICANN guidance, then the ICANN Board should have provided extra scrutiny to other potential options to ensure the equitable stewardship of the .AMAZON TLD extensions.

Expedited Processing of Colombia Government's Original DIDP

The Colombia government appreciates the expedited manner in which ICANN.Org processed its original DIDP (20180402-1). It appears that ICANN deviated from its standard operating procedure in waiting the full 30 days before publicly posting a response to a DIDP request. The Colombian government hopes that ICANN.org will be able to act in a similar expedited to provide the ICANN Board some of the documents requested in this Reconsideration Request.

ICANN's Questionable Sense of Urgency

The ICANN Board in its rationale for the Resolution stated in relevant part that:



in terms of fairness and ICANN's obligations to treat applicants equally, the Board believes that the activity spanning the past seven years, during which the .AMAZON applications have followed the course of the AGB and have been the subject of other ICANN processes, supports the decision to allow the applications to continue to proceed.

While the Colombia government supports all applicants being treated equally and fairly in accordance with the ICANN bylaws, the Colombia government struggles to identify ICANN's sense of urgency in connection with the .AMAZON applications in light of the .HOTEL application. The .HOTEL application had an IRP decision rendered on 12 February 2016, a whole year before the Amazon Inc. IRP decision (11 July 2017). According to the ICANN website there has been a "second" pending Cooperative Engagement involving the .HOTEL application initiated on 2-October-2018. There appears to have been a delay of over eight months in connection with this Cooperative Engagement with no apparent action taking place. If ICANN is so concerned about fairness and multi-year delays, where is ICANN's same sense of urgency in connection with the .HOTEL application?

The Colombia government would also like to point out the following representation that ICANN made publicly in the final published Applicant Guidebook back in 2012.

The goal is for the next application round to begin within one year of the close of the application submission period for the initial round.

It has now been over seven years since the close of the application submission period for the last round of new TLD applications. Despite repeated requests from members of the ICANN community to expedite a new round, the ICANN Board has maintained a slow and steady pace to get it right. Through this Reconsideration Request the Colombia government hopes that the ICANN Board would abandon its previous rush to judgement in connection with the AMAZON TLDs. Instead, the ICANN Board should permit the parties to continue to negotiate in good faith toward a mutual goal, absent an artificial deadline imposed by ICANN. Amazon the Company currently has been delegated over 50 other TLDs, it is not like Amazon the Company is being denied the opportunity to innovate with these other TLD extensions while ICANN takes the time to get it right in connection with these .AMAZON strings.

Violation of the ICANN Bylaws Regarding Timely Posting of the Board Agenda

Article 3.4 of the ICANN bylaws state in relevant part that:

At least seven days in advance of each Board meeting (or if not practicable, as far in advance as is practicable), a notice of such meeting and, to the extent known, an agenda for the meeting shall be posted.



However, the agenda for the 15-May-2019 ICANN Board meeting was published one (1) day in advance of the actual meeting.¹ While the bylaws provide some latitude in connection with qualifiers like “as is practicable.” It appears upon information and belief that this meeting and the agenda was known about before it was scheduled, and the agenda withheld until the last minute. It is important to note that there were three specific agenda items at the 15-May-2019 Board meeting: 1) Consideration of GAC Advice: Kobe Communiqué (March 2019); 2) Consideration of GNSO EPDP Recommendations on the Temporary Specification for gTLD Registration Data and 3) Consideration of Amazon Corporation's Proposal on ACTO Member States Continuing Concerns re: .AMAZON New gTLD Application

The Colombia government fully recognizing the time sensitive nature of the first two agenda items, particularly the Temporary Specification that was set to expire. However, Amazon the Company's TLD applications do not appear to merit the same sense of urgency. The basis for the Colombia government's representation that the eDPD and Amazon would be timely addressed by the ICANN Board, is a statement made by Chris Disspain, ICANN Board Vice-Chair at the Bangkok GDD Summit on 9-May-2017.

During the Board session with GDD Summit attendees, Chris Disspain at 12:38 minutes in the Zoom record conflates the eDPD issue and the Amazon issues. Chris Disspain acknowledged that at the ICANN Board retreat in Istanbul just prior to the GDD Summit, the issues of the ePDP and .AMAZON were discussed and some work needed to be done.²

The Colombia government finds it hard to believe that the agenda for the ICANN Board meeting was not known until less than 24 hours before the 15-May-2019 special Board meeting. While it respects the ICANN Board taking action in violation of the 7 day agenda posting requirement in connection with the ePDP agenda item, there appears to be no similar sense of urgency in connection with Amazon the Company's applications. It appears that ICANN merely intended to bootstrap the urgency of the ePDP to pass the Amazon resolution.

Violation of the ICANN Bylaws Regarding Failure to Operate to the Maximum Extent Feasible in an Open and Transparent Manner

In Document Information Disclosure Policy (DIDP) Request 20190402-1 the Colombia government asked for information about any proposed change process whereby a Registry Operator could amend previously committed to Public Interest Commitments (PIC) Specifications. This request was made based upon information and belief about an initiative within the Registry Stakeholder Group. The Colombia government was disappointed when it acknowledged that a single Registry Operator had requested such a process but denied any

¹ See <https://www.icann.org/resources/board-material/agenda-2019-05-15-en>

² See <https://www.icann.org/resources/pages/gdd-summit-session-recordings-2019-05-08-en> (Session with Members of ICANN Board)

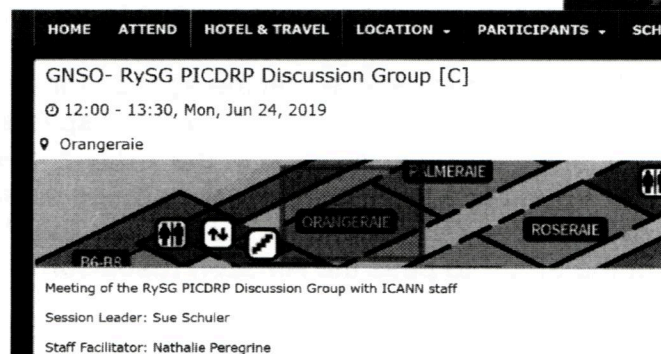


further information stating:

While ICANN org cannot disclose details of the Registry Operator's request to amend its Specification 11 and ICANN org's response for the reasons set forth below, ICANN org notes that it was unable to proceed with the request at the time and deferred the request. The documents regarding the Registry Operator's request to amend its Specification 11 are subject to the following DIDP Conditions of Nondisclosure (Nondisclosure Conditions) and are therefore not appropriate for disclosure.

While the Colombia government accepted this determination without further objection, we were disappointed to learn that ICANN staff has a scheduled a session on this very subject with the ICANN Registry Stakeholder Group at the upcoming Marrakech meeting. However, what we find unconscionable is that according to the current public agenda this is a closed session open only to ICANN staff and the Registry Stakeholder Group,

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We would request that given the key importance of the PIC Specification to GAC members in ensuring that the proposed Amazon the Company PIC Specifications are properly enforced that all such future sessions be open for observation by interested third parties. Additionally, the Colombia government would respectfully request that ICANN delay any Registry Agreement execution with Amazon the Company until the current PIC modification process underway within the Registry Stakeholder Group is successful concluded or terminated.

9. What are you asking ICANN to do now?

The Colombia government is asking that ICANN.Org stay any further actions in connection with the processing of Amazon the Company's applications covered in the above cited ICANN resolutions, e.g. .AMAZON (Application ID: 1-1315-58086), アマゾン(Application ID: 1-1318-

83995) and 亚马逊 (Application ID: 1-1318-5591) until the concerns raised in this Reconsideration Request have been fully and properly addressed.

The Colombia government is also asking for confirmation from ICANN.Org on whether the multi-purpose use of the AMAZON strings by Amazon the Company and ACTO Member States is consistent ICANN's existing Specification 13 requirements. Additionally, we are requesting that the ICANN Board be provided a confidential briefing document on the approximately thirty-seven Specification 13 requests that were either "Not Approved or Withdrawn" to see if any Non-Approval or Withdraw applications were based in part upon the use of domain names by a third party other than the "Registry Operator, its Affiliates or Trademark Licensees."

The Colombia government would respectfully request that the ICANN.Org direct SSAC to prepare report for the ICANN Board to address the security and stability concerns raised by Amazon the Company in connection with the concurrent use proposal made by the Colombia government. The Colombia government is available to answer any clarifying questions that SSAC might have in preparation of this report. At a minimum, SSAC should address if there are any inherent security and stability concerns in connection with the operation of the .SAS TLD and how a proposed a joint use TLD framework could happen in a safe and secure manner.

The Colombia government is further requesting that the ICANN Board encourage the parties to engage in continued constructive dialog during the pendency of this Reconsideration Request and that any updated discussions be incorporated into any ICANN Board action.

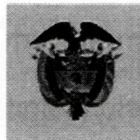
Finally, the Colombia government would request that ICANN delay any Registry Agreement execution with Amazon the Company until the current PIC modification process underway within the Registry Stakeholder Group is successful concluded or terminated. Given the critical importance that the PIC Specification plays in the Amazon governance and accountability framework, the Colombia government needs to know that the representations made by Amazon the Company cannot be easily altered after contractual execution.

10. Please state specifically the grounds under which you have the standing and the right to assert this Reconsideration Request, and the grounds or justifications that support your request.

The Colombia government respectful cites to the above references bylaws violations for the basis of its right to assert this Reconsideration Request.

11. Are you bringing this Reconsideration Request on behalf of multiple persons or entities? (Check one)

Yes



No. This Reconsideration Request is specifically associated with previous points raised by the Colombia government in its communication dated 7-April-2019 and its Document Information Disclosure Policy (DIDP) request 20190402-1.

11a. If yes, is the causal connection between the circumstances of the Reconsideration Request and the harm substantially the same for all of the Requestors? Explain.

12. Are you bringing this Reconsideration Request on an urgent basis pursuant to Article 4, Section 4.2(s) of the Bylaws?

Yes

No

12a. If yes, please explain why the matter is urgent for reconsideration.

As noted above there have been multiple violations of the ICANN Bylaws in connection with ICANN's actions to proceed with the processing of Amazon the Company's applications. Failure to halt contract execution and potential delegation will have a direct impact on the obligations of the Colombia government to the ingenious territories and people within the Colombia Amazon Region.

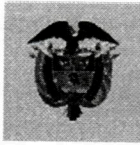
13. Do you have any documents you want to provide to ICANN?

See attached 7-April-2019 email communication and accompanying letter.

Terms and Conditions for Submission of Reconsideration Requests

Reconsideration Requests from different Requestors may be considered in the same proceeding so long as: (i) the requests involve the same general action or inaction; and (ii) the Requestors are similarly affected by such action or inaction. In addition, consolidated filings may be appropriate if the alleged causal connection and the resulting harm is substantially the same for all of the Requestors. Every Requestor must be able to demonstrate that it has been materially harmed and adversely impacted by the action or inaction giving rise to the request.

The BAMC shall review each Reconsideration Request upon its receipt to determine if it is sufficiently stated. The BAMC may summarily dismiss a Reconsideration Request if: (i) the Requestor fails to meet the requirements for bringing a Reconsideration Request; or (ii) it is frivolous. The BAMC's summary dismissal of a Reconsideration Request shall be documented and promptly posted on the Reconsideration Website at <https://www.icann.org/resources/pages/accountability/reconsideration-en>.



Hearings are not required in the Reconsideration Process; however, Requestors may ask for the opportunity to be heard. The BAMC retains the absolute discretion to determine whether a hearing is appropriate, and to call people before it for a hearing. The BAMC's decision on any such request is final.

For all Reconsideration Requests that are not summarily dismissed, except where the Ombudsman is required to recuse himself or herself and Community Reconsideration Requests, the Reconsideration Request shall be sent to the Ombudsman, who shall promptly proceed to review and consider the Reconsideration Request. The BAMC shall make a final recommendation to the Board with respect to a Reconsideration Request following its receipt of the Ombudsman's evaluation (or following receipt of the Reconsideration Request involving those matters for which the Ombudsman recuses himself or herself or the receipt of the Community Reconsideration Request, if applicable).

The final recommendation of the BAMC shall be documented and promptly (i.e., as soon as practicable) posted on the Reconsideration Website at <https://www.icann.org/resources/pages/accountability/reconsideration-en> and shall address each of the arguments raised in the Reconsideration Request. The Requestor may file a 10-page (double-spaced, 12-point font) document, not including exhibits, in rebuttal to the BAMC's recommendation within 15 days of receipt of the recommendation, which shall also be promptly (i.e., as soon as practicable) posted to the ICANN Reconsideration Website and provided to the Board for its evaluation; provided, that such rebuttal shall: (i) be limited to rebutting or contradicting the issues raised in the BAMC's final recommendation; and (ii) not offer new evidence to support an argument made in the Requestor's original Reconsideration Request that the Requestor could have provided when the Requestor initially submitted the Reconsideration Request.

The ICANN Board shall not be bound to follow the recommendations of the BAMC. The ICANN Board's decision on the BAMC's recommendation is final and not subject to a Reconsideration Request.

By submitting my personal data, I agree that my personal data will be processed in accordance with the ICANN [Privacy Policy](#), and agree to abide by the website [Terms of Service](#).

Signature 

Date 15-06-2019.

Ivan Castano
Print Name

