

December 19th, 2019

Subject: Letter from the Internet Governance Caucus re: the sale of .org

To: Andrew Sullivan, President & CEO of the Internet Society, and Gonzalo Camarillo, Chair of the Board of Trustees, Internet Society

As members of a network which encompasses many non-commercial organizations and individuals, we are concerned by the announcement that Ethos Capital intends to acquire the assets of the Public Interest Registry (PIR) from the Internet Society (ISOC), including the .ORG, .NGO, and .ONG Registry Agreements. We ask that this sale be called off.

Principally, we are concerned that the sale of PIR to a private entity investment firm would significantly alter the Domain Name System and weaken ISOC. PIR played an important role, as the only remaining non-commercial top-level domain registry operator, in serving as a counterbalance against commercial exploitation. PIR ran .ORG, .NGO, and .ONG for the benefit of its users, whereas other top-level domains are run by private companies with purely financial objectives. While the interests of companies and users do at times overlap, they can also conflict, and when this occurs there are significant human rights implications. PIR, as a subsidiary of ISOC, could be relied upon to do what was best for domain name registrants, and has a proud history of doing just that. However, PIR also gave ISOC greater legitimacy and wider influence. It allowed ISOC to take an even more active role in shaping Internet infrastructure. In relinquishing its control over PIR, ISOC would lose some of its ability to directly impact how millions of people around the world positively experience the Internet every day, and we think that is a great pity.

We understand that Ethos Capital approached ISOC with an offer in September 2019 and that an agreement had been reached to sell PIR by November 2019. This secret process caught us, and everyone, unaware, not just of the transaction but of the urgency to divest of PIR.

We join ICANN in its 9 December 2019 letter calling for ISOC to be more transparent about the proposed sale of PIR and we call for more inclusiveness in addition. We ask that ISOC commit to publishing on its website all correspondence and documents exchanged with ICANN in relation to the proposed change in control of PIR. In addition, we ask that ISOC commit to publishing on its website any filings (including motions and petitions) in the Pennsylvania Orphans' Court relating to the change in status of the PIR.

We expect an organization that operates in the public interest, and who promotes the values of openness, trust, and transparency, to be coherent with those values when making major decisions.

This is a major decision that would result in a significant change, for ISOC and for the Internet community, and it has been proposed a) without a human rights impact assessment being conducted, b) without consultation with impacted stakeholders, and c) without appropriate safeguards in place to protect the interests of .ORG, .NGO, and .ONG registrants and the people who visit their websites every day.

ISOC has successfully stewarded .ORG via PIR for 17 years, gaining a reputation as a careful manager of a resource that truly is the global home for nonprofits and the noncommercial community. Given this background, and ISOC's stated commitments to transparency and openness, we are unable to reconcile the path that ISOC has taken with the values we thought ISOC espoused. Accordingly, we call upon ISOC to withdraw from its negotiations with Ethos Capital, and to withdraw from selling PIR, so to honor its charter.

Sincerely yours,

Internet Governance Caucus (IGC)*

**The Internet Governance Caucus is composed of 500 individual members. Please see more information on the IGC here: <https://igcaucus.org/igc-charter/>*