



October 18, 2023

To ICANN,

The International Foundation for Online Responsibility (IFFOR) was established to act as the Sponsoring Organization for ICM Registry and develop domain registration and abuse policies that ensured the safety and security of the .XXX top-level domain (TLD), its content, and access.

We write regarding ICANN and ICM Registry's plan to migrate the current .XXX Registry Agreement from a Sponsored TLD to the new gTLD Agreement, under terms similar to those that exist in ICM Registry's agreements with ICANN for the .porn, .sex and .adult TLDs.

IFFOR has been aware of contract negotiations regarding the .XXX Registry Agreement and that the contract may migrate from a Sponsored TLD to a generic TLD, without the need for a sponsoring organization under the new gTLD Agreement.

It is IFFOR's belief that the prevailing Baseline Policies, developed by IFFOR and put in place when ICANN entered into the .XXX Registry Agreement with ICM Registry in 2011, have worked. IFFOR has carried out an annual review of the .XXX TLD, its policies and practices, every year since 2011. Those reviews have revealed how effective the policies have been, and continue to be, in preventing abuse within the .XXX namespace.

We understand that ICM Registry plans to incorporate those policies within a revised .XXX Registry Agreement. The continued use of those policies and practices, we believe, will produce similar results going forward, and does not require IFFOR to serve as the Sponsoring Organization to ensure they are effective.

In short, IFFOR has successfully served its purpose with regard to the .XXX TLD.

One area that will be impacted by a change in the .XXX Registry Agreement is IFFOR's Grants program. IFFOR has provided grants to organizations focused on child protection and education for over a decade; an initiative made possible through ICM Registry's continued funding. Since 2011 IFFOR has provided over 100 such grants.

As there will be a change in funding to IFFOR, we expect that grants program to come to a close. To that end, in 2023 we made our key educational resource available as an ongoing open enrollment grant at no cost to interested organizations so that it might have the maximum impact possible.

We wish the parties well in their efforts to ensure the safe and secure use of the .XXX TLD.

Sincerely,

The IFFOR Board of Directors