

Brasilia, 7 May 2019

Mr. Cherine Chalaby  
Chair, Board of Directors  
ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094

Dear Members of the ICANN Board of Directors,

As you prepare to adopt a decision on the .amazon applications, let me reaffirm Brazil's commitment to the multi-stakeholder approach to Internet governance, with the full participation of all stakeholders, in their respective roles and responsibilities.

Allow me also to recall that the members of the ICANN Board in 2014 accepted to follow the consensus public policy finding of the Governmental Advisory Committee (GAC) concerning the .amazon applications, which, in accordance with the non-objection procedure set forth in the Applicant Guidebook 2012, were deemed to, and clearly continue to, raise political sensitivities as judged by the governments responsible for the public interest in the whole area to which the name Amazon is related.

The GAC also expressly recognized, in 2017, the need for a mutually acceptable solution (to all eight Amazon countries and the applicant company Amazon Inc.) for the delegation of the .amazon strings. This has been the only development in the GAC's consensus position regarding the .amazon applications ever since.

The .amazon strings correspond not just to a brand. The applicant company itself recognized, in 2015, that the .amazon applications represented the very "challenging issue of geographic names" for which a mutually acceptable solution was needed.

Under the Applicant Guidebook 2012, *"applicants are encouraged to identify potential sensitivities in advance of application submission, and to work with the relevant parties (including governments) beforehand"*, and *"applicants are encouraged to identify possible regional, cultural, property interests, or other sensitivities regarding TLD strings and their uses before applying and, where possible, consult with interested parties to mitigate any concerns in advance"*.

Recently, some misunderstandings about the Amazon countries' proposed solutions may have been conveyed to the ICANN Board, which is my duty to correct.

The proposed Steering Committee for the .amazon strings should only have responsibilities over a limited number of issues, over well-defined terms, which do not include domain names that do not cause confusion or mislead about matters specific to the Amazon region (not general oversight or veto rights). This Committee should allow equal representation of both sides (the Amazon countries, on the one hand, and the applicant company, on the other), and it would only act by consensus (not by majority vote or in any other way that outweighs the applicant company's voice, as has been inaccurately leaked to the media).

Moreover, it has been clear from the outset that the purpose of any shared-used by the Amazon countries of the .amazon strings would be to safeguard the natural and cultural heritage of the Amazon region and its peoples, never to function as an e-commerce platform for the promotion of private commercial interests.

Finally, the definition of protected terms should only be broadened as to include names that can mislead or cause confusion in the public as to whether the respective domain names are operated by a private company or by the countries concerned, such as "ecotourism.amazon", "hotels.amazon" and "acai.amazon", the names of Amazon cities, its rivers or of local culinary dishes.

In the applicant company's definition, however,

*"For purposes of this Policy, "Culture and Heritage specific to the Amazonia region" means the names of indigenous peoples' groups, and national symbols of the countries in the Amazonia region, and the specific terms "OTCA", "culture", "heritage", "forest", "river", and "rainforest", in English, Dutch, Portuguese, and Spanish."*

I sincerely hope that the decision of the ICANN Board on the .amazon applications will take into account the public interest represented by the eight Amazon countries, and that it will strengthen the legitimacy of ICANN as an entity with significant responsibilities for the management of Internet's critical resources for the entire world.

Yours truly,

A handwritten signature in black ink, appearing to read 'Zaluar', with a stylized, cursive script.

Achilles Zaluar

Ambassador  
Director, Department for Technological Promotion  
Ministry of Foreign Affairs, Brazil