

Dear Mr Crump,

The Working Group would like to thank the Fédération Internationale des Conseils en Propriété Intellectuelle for its comments dated 9 April 2014 in response to the Working Group's questionnaire (see the copy on the ICANN wiki: <http://bit.ly/1zb8Lpi>). The Working Group needed to treat your comments as public comments, as the Federation is not a member of the Working Group, and so is only now able to address them.

The Working Group discussed the comments during its meeting on December 18 2014. Broadly speaking, they support the arguments assembled by the Working Group for mandatory transformation in the Working Group's initial report:
www.icann.org/news/announcement-2014-12-16-en

The Working Group found that some parts of the comments were not clear:

- The phrase "From a legal point of view" is used, but it is not clear which jurisdictions are being referred to.
- Why should the burden of transformation be divided between the registrants and the registrar?
- Why should the cost be divided between registries and registrars?

We would like to invite you to answer these questions that your contribution has raised within the Group and to encourage you to submit a new comment by the 1 February deadline.

Thanking you again for your contribution and in advance for any further comments,

Regards,

Chris Dillon.

(Co-Chair, Translation and Transliteration of Contact Information Policy Development Process Working Group)

--

Research Associate in Linguistic Computing, Centre for Digital Humanities, UCL, Gower St, London WC1E 6BT Tel +44 20 7679 1599 (int 31599) www.ucl.ac.uk/dis/people/chrisdillon