## Suggested by David McAuley:

Are you aware of any material, documented instance(s) where ICANN has been unable to pursue its Mission because of its jurisdiction? If so, please provide documentation.

Are you aware of and able to document the existence of an alternative jurisdiction where ICANN would not be so prevented from pursuing its Mission? If so, please provide documentation.

Alternative combining this with elements of prior alternatives:

Are you aware of any material, documented instance(s) where ICANN has been unable to pursue the actual operation of its policies and accountability mechanisms to mechanisms because of its ICANN's jurisdiction? If so, please provide documentation, including specific examples and references to specific laws.

Are you aware of and able to document the existence of an alternative jurisdiction where ICANN would not be so prevented from pursuing the actual operation of ICANN's policies and accountability mechanisms its Mission? If so, please provide documentation, including specific examples, references to specific laws, case studies, other studies, and analysis.