



September 27, 2016

ICANN Board of Directors
c/o Mr. Steve Crocker, Chair
12025 Waterfront Drive,
Suite 300 Los Angeles, CA 90094

Telnic's observations on past achievements and opportunities for .tel

Dear Chairman Crocker and Members of the ICANN Board,

Having read with great interest the feedback from the public comment period, I would like to take this opportunity to reflect on some of the .tel highlights achieved since our TLD launch in March 2009 and address some of the challenges and opportunities that lie ahead.

The .tel concept was and remains unique within the internet domain industry and no other registry or TLD has offered such an innovative approach to the use of the DNS nor in our opinion offered such a compelling value proposition over and above the basic provision of a domain name. Telnic has and continues to offer a fully integrated package of domain name, hosting and content management platform and tools to its registrars and community members at a highly competitive and accessible price point. Since 2009, our distribution channel has grown to over 130 globally distributed registrars who serve a community base of over 100,000 users in 50 countries worldwide.

Telnic have been pioneers in their development of the TLD especially with respect to the use of the DNS for storage of contact data which remains of fundamental importance to the service we offer our community going forward. This focused and innovative use of the DNS has allowed tens of thousands of individuals and small businesses to take their first step onto the internet by providing them with a fully mobile optimised, non-technical solution for publishing and sharing their contact information and thus providing them with a cost efficient solution to establishing an internet presence and their very own digital identity.

We feel very proud of our contribution in this regard having helped to open up internet access to groups of individuals and organisations that may have struggled with either the technical or cost challenges of more traditional internet access strategies. This trend is still very relevant 8 years after launch and we see a huge opportunity in the emerging markets of Africa and India for .tel to provide the same benefits as have already been experienced amongst our existing community of users.



The development and support of our global Telhosting platform has represented a significant and ongoing investment by Telnic and .tel registrars and owners continue to benefit from this investment in the form of an extremely low and competitive commercial service fee whilst some organisations have taken full advantage of our licenced software to create their own unique .tel products and services that are integrated with their wider portfolios – this has proven particularly successful in China where we have helped a number of registrars to set up product and service offerings based on our Telhosting platform.

Community involvement and outreach has always been an integral part of the TLD development and Telnic prides itself with being one of the most open and transparent registries with respect to community interaction. We continue to host an online forum where community members can share their experiences, ask questions and get product support either from Telnic or other community members and our newsletters have been very popular as a means of providing the community with TLD updates.

Telnic has always worked closely with its registrar distribution channel and community members to ensure that product development (where economically feasible) has been prioritised, funded and aligned to the direct needs of the community and, we continue to evolve the product for the benefit of our community members. You will find in Appendix A, a full list of roadmap updates made to the Telhosting platform and supporting systems and apps, many of which have been the result of direct consultation with community members and registrars. I would also like to point out that no additional charge was levied on registrars to fund this development programme and we have continued to provide both standard registry services and Telhosting services for the basic wholesale fee.

Being a UK based registry and in recognition of EU and UK data protection legislation especially as it pertains to natural persons, Telnic was one of the first registries to run a Special Access Service to allow legitimate WHOIS access to trademark owners or their representatives to protect their legal rights. This process was designed and implemented with ICANN's full support and we believe is a model that strikes a good balance between compliance with data privacy legislation in the UK and Europe, the needs and objectives of ICANN's WHOIS policy and trademark owners.

Telnic's success has also been recognised by the industry and has resulted in a number of key awards including the UK IT industry award, the CeBIT European Seal of e-Excellence award, the Gartner Cool Vendor award in Context aware computing and winner of the European Association of Directory Providers (EIDQ) Innovation award.

As we approach the first renewal of the .tel registry agreement, we have once again taken on board community feedback and acknowledge that there may have been certain levels of frustration within the community with respect to the restriction of use pertaining to user defined DNS records. In recognition of these frustrations and in the interests of allowing .tel



the scope and flexibility to further innovate and compete with the nTLD landscape and marketplace, our renewal application contains a request to amend these restrictions.

Telnic is now an experienced registry and .tel an established and recognised TLD with an active community and a strong partner distribution channel. This has been achieved despite two of the world's leading registrars (representing a combined market share of around 35% of gTLDs) choosing not to distribute .tel due to the DNS restrictions of use imposed under the current registry agreement. We consider this to be a great achievement and are confident that through a relaxation in restrictions, we will be able to grow and innovate at a much quicker rate.

The concept of .tel as a mechanism for making contact information accessible and useable on any Internet enabled device remains at the heart of Telnic's mission and I am excited at the prospect of the next phase of the TLD development as we expand our distribution channel through existing and emerging markets and grow our community further through product innovation, great customer service and offering unparalleled value for money to our customers.

I would like to thank the ICANN Chairman and members of the ICANN board for considering this letter in respect of Telnic's registry agreement renewal application.

Yours Sincerely,

A handwritten signature in black ink that reads "Khashayar Mahdavi". The signature is written in a cursive, flowing style.

Khashayar Mahdavi
CEO – Telnic Ltd



Appendix A – Additional Features added to the .tel service since launch in 2009

Internal ID	Description
TEL109	TelProxy - No redirect for http requests (e.g. if the user types http://telnic.tel into address bar then this is what remains in the address bar)
TEL110	TelHosting Admin Control Panel - Enhanced support for registrar zone management
TEL111	Tool - User downloadable scripts to allow the embedding of .tel contact data into another webpage
TEL112	TelHosting - Extension to the flexibility of Go To Records (These can now be added independently of folder addition)
TEL113	TelHosting - Support for MX records
TEL114	TelHosting - Support for Rename folder functionality
TEL115	Telhosting/Telproxy - Support for private data
TEL116	Telhosting/Telproxy - Addition of username and note contact types
TEL118	Telhosting/Telproxy - Addition of "Domain Display String" contact type
TEL119	Telhosting - Enhanced support for domain transfers
TEL120	Telhosting/Telproxy - Increased length of free text fields
TEL121	Beta launch of TelPages
TEL122	Telhosting/Telproxy - Introduction of longer descriptive labels for contacts
TEL125	TelHosting - Data Import/Export functionality (to further streamline transfers)
TEL133	TelHosting - Enhanced password security
TEL128	TelProxy - Introduction of an advertisement record type
TEL129	TelProxy - Stats logging for individual users
TEL107	TelHosting - Increased support for number of subdomains within a single domain to 3000
TEL132b	iPhone Client for .tel domain management
TEL132a	Android Client for .tel domain management
TEL132c	BlackBerry / Outlook - Client for .tel domain management (and lookup)
TEL126	TelFriends - Streamlined sign-up processes
TEL139	TelHosting - SOAP API Usability enhancements (related to domain import/export)
TEL141	Windows Mobile client for .tel domain management
TEL155	TelHosting - Introduction of throttling mechanisms to prevent abusive system usage
TEL168	TelHosting - DNS provisioning profiling to ensure a fairer allocation of system resources
TEL150	TelProxy - Introduction of icon support for third party systems (e.g. Facebook, twitter etc)
TEL151	TelHosting/TelProxy - Support for the display of avatar images
TEL160	TelHosting/TelProxy - Ability for user to connect/disconnect from TelPages search
TEL159	Windows Mobile - Further functionality enhancements
TEL171	TelProxy - New proxy page design
TEL172	TelProxy - Ability to login to TelHosting directly from TelProxy

TEL173	TelProxy - Addition of the "Rich Content" record type
TEL174	TelProxy - Addition of inline GoogleMaps
TEL175	TelHosting - Domain expiry reminder shown in user account
TEL176	TelPages - Introduction of a search api for use by third party applications
TEL177	TelHosting/TelProxy - Addition of support for Google AdSense
TEL179	TelPages - Release of version 1.0 (complete with changes raised by the community within the Beta phase)
TEL184	TelProxy - Support for the Google canonical tag for improved search ranking/relevance
TEL149	TelHosting/TelProxy - Support for 5 different TelProxy templates (user selectable)
TEL187	TelHosting/TelProxy - Ability to connect/disconnect to Telnic.org, TelHosting from directly within the TelProxy page
TEL180	TelHosting/TelProxy - Multi-Lingual
TEL190	TelHosting/TelProxy - User selectable colours within TelProxy
TEL188	TelProxy - hCard tagging for .tel domains to ensure more relevance search matching
TEL130	TelHosting/TelProxy - Support for custom record types (can be introduced by individual registrars)
TEL146	TelHosting - Introduction of support for both OpenAuth and OpenID
TEL195	TelHosting - Enhancement to createZone command to prevent registrar blocking of zones
TEL196	TelHosting - Support for extended character usernames (e.g. Email addresses can now be used)
TEL200	TelHosting - Zipping zone transfers to improve performance in regards to DNS propagation
TEL189	TelProxy - Integration of embedded TelPages search results
TEL152	TelPages - Launch of TelPages 2.0
TEL203	TelProxy - Introduction of a smartphone specific TelProxy template
TEL161	TelHosting - Introduction of a test harness for accrediting third party TelHosting providers
TEL143	TelHosting - Introduction of a migration script to facilitate transfer of domains from one telhosting provider to another
TEL156	BlackBerry / Outlook - Client enhancements
TEL142	TelHosting - Backend enhancements to allow multiple TelHosting instances to feed a single set of nameservers
TEL201	TelHosting - Delta Zone transfers (DNS propagation improvements by only transmitting the changed portion of a domain to nameservers)
TEL215	TelHosting/TelProxy - Addition of support for Traditional Chinese
TEL191	TelHosting/TelProxy/TelPages - Enhancements to ensure compatibility with IDN domains
TEL221	Android - Launch of Superbook Application
TEL222	iPhone - Launch of Superbook Application
TEL223	TelProxy - Support for Image Advertisements
TEL231	TelHosting/TelProxy - Support for GoogleAnalytics

TEL230	TelHosting - Backend script to cleanup registrar domains post expiry
TEL205	TelHosting - Introduction of domain setup wizard for new users
TEL244	TelHosting/TelProxy/TelPages - Enhancements to ensure compatibility with 1 & 2 character domains
TEL245	TelHosting - Registrar process to remind of forthcoming certificate expiry
TEL238	TelProxy - Reworked smartphone template
TEL229	TelProxy - Introduction of Google AdSense for smartphones
TEL284	TelProxy - Introduction of automatic redirect code
TEL285	TelProxy - Enhancements to smartphone telproxy searching
TEL286	TelProxy - Further enhancement to hcard structure
TEL287	TelProxy - Further support for third party icons
TEL299	TelHosting/TelProxy - Addition of support for embedded movies
TEL237	TelHosting/TelProxy - Introduction of support for three further templates (as designed by the community)
TEL281	TelPages - Rework of the indexing process to ensure domains are more frequently indexed
TEL304	TelHosting - Introduction of a further queueing mechanism to improve overall DNS propagation times.
TEL312	Introduction of support for French IDN names
TEL232	TelHosting - System optimization to increase frontend speed
TEL239	TelHosting - Further DNS propagation queueing enhancements
TEL309	TelHosting -Performance upgrades to the mini nameserver DNS system
TEL332	TelHosting / TelProxy – Passbook Implementation
TEL331	TelHosting / TelProxy – Additional TelProxy templates
TEL372	TelHosting / TelProxy – Enhanced Image Gallery
TEL378	TelHosting / TelProxy – Support for PayPal
TEL391	Android – Support for PayPal
TEL390	iPhone – Support for PayPal
TEL393	TelHosting / TelProxy – Support for updated header section
TEL395	TelHosting/TelProxy/Android/iPhone – Introduction of custom icon set colours
TEL405	TelHosting / TelProxy – Addition of image ad support
TEL406	TelHosting / TelProxy / TelPages – Migration of mapping to Google Maps v3
TEL410	iPhone App – Support for Image Ad
TEL411	Android App – Support for Image Ad
TEL413	iPhone App – Support for updated header section layout
TEL414	Android App – Support for updated header section layout
TEL412	TelHosting / TelProxy - Support for YouTube / Vimeo / DailyMotion video formats
TEL417	TelHosting – Support for dashboard images (and Dropbox integration)
TEL421	TelHosting / TelProxy – Support for background images
TEL418	TelProxy – Support for custom colours in smartphone variant + minor fixes



TEL424	iPhone app – Functionality updates / performance improvements
TEL425	Android app – Functionality updates / performance improvements
TEL426	TelHosting / TelProxy – Introduction of a CDN for Image Server
TEL428	TelProxy – Restructure to make use of CDN and general optimization
TEL439	iPhone App – Streamlined Telnames app functionality
TEL440	Android App – Streamlined Telnames app functionality
TEL441	TelHosting / TelProxy – Updated mobile AdSense functionality in line with Google changes