

Reconsideration Request Form

Version as of 16 April 2026

The present form complements and amends Requestor's request for reconsideration of 17 September 2026, i.e. request for reconsideration 26-6.

1. Requestor Information

Name: **Neil Fraser**

Address: **Seestrasse 512, 8038 Zurich, Switzerland**

Email: **root@neil.fraser.name**

Phone Number (optional): **+41 76 296 84 00**

Represented by:

Name: Flip Petillion, Jan Janssen, Diégo Noesen

Address: Guido Gezellestraat 126, 1654 Beersel, Belgium

Email: fpetillion@petillion.law; jjanssen@petillion.law; dnoesen@petillion.law

2. Request for Reconsideration of:

☐ **Board action/inaction**

☒ **Staff action/inaction**

3. Description of specific action or inaction of the ICANN Board or staff that you are seeking to have reconsidered.

On 15 April 2026 Verisign submitted RSEP-2026013 requesting the termination of all 3rd-level .name domains.

On 28 July 2026 ICANN approved the above proposal. (RSEP ID: #01581614)

4. Date of ICANN Board or staff action/inaction:

The approval to Verisign is dated 28 July 2026.

5. On what date did you become aware of the ICANN Board or staff action or that the action would not be taken?

On 26 August 2026 Requestor's registrar (007Names) emailed him with the subject "Important Notice: Changes to Certain .NAME Services".

6. Describe how you believe you are materially and adversely affected by the ICANN Board or staff action or inaction being challenged:

- a) For the past 25 years Requestor has built his online identity around his domain. Specifically, his website will disappear from the Internet. And his email address will disappear from the Internet. And all the IoT devices that use APIs on his domain will become bricks. This represents a significant loss of stability, loss of reputation, and financial damage.
- b) After Requestor's 3rd-level domain is deleted (neil.fraser.name) as well as his daughter's domain (beverly.fraser.name), the 2nd-level domains will become available for registration (fraser.name). Should someone with ill-intent register this domain before Requestor does, then they would be able to recreate his website, email address, and APIs. This would grant them access to hundreds of accounts (both online and offline) which are linked to that address. They would have access to banking, government, taxes, and other services. There is no way to enumerate all the accounts that have been opened using this email address over the past quarter century. Examples of security risks associated to this and the impossibility to mitigate these risks are explained in paragraphs 7 to 10 of reconsideration request 26-7, which are incorporated herein by reference.
- c) Multiple 3rd-level .name holders have approached Verisign to request their 2nd-level domain. In every case Verisign has refused -- even when they are the sole user of that 2nd-level. This refusal is not only a clear indication that

Verisign is planning to sell these newly vacated 2nd-level domains at a premium; it is diametrically opposed to the ‘for life’ promise that was made to registrants of .name subdomains who continued to renew and pay the renewal fees.

7. Describe how others may be adversely affected by the ICANN Board or staff action or inaction, if you believe that this is a concern.

There are over 22,000 other 3rd-level owners in the same position as me. I've spoken with a handful of them and they have similar issues. One of them is a pediatrician who uses his email address as his primary contact with patients. Others had not heard of this shutdown, since the notifying email from their registrar was classified as spam.

8. Detail of Board or staff action/inaction – Required Information

ICANN staff approved a request by Verisign, filed through the Registry Services Evaluation Policy (RSEP) process, to discontinue third level domain registrations for the .name TLD (RSEP-2026013).

In so doing, ICANN relied on a submission by Verisign that was extremely misleading to the point of not being factual. Specifically, RSEP-2026013 states,

2. SECURITY AND STABILITY

2.1. What effect, if any, will the proposed service have on the life cycle of domain names?

None. There will not be any effect on the life cycle of domain names.

Verisign does not appear to have accurately described the effect of terminating over 22,000 domain names which have been bought and paid for. Nor did Verisign describe the security and stability aspects of what happens when bad actors register the 2nd-level domains and gain control over thousands of accounts and devices.

In response to question 7.3, RSEP-2026013 states:

7.3. Provide any other relevant information include with the request. If none, respond with "N/A."

None

Furthermore, in the same document Verisign states:

3.6. Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed service? If so, please describe the communications.

No. Not applicable.

Verisign admits to not consulting with any of the entities affected by this shutdown.

They did not consider the business impact on users. They did not consider the security impact on users. They submitted this document completely blind to the consequences.

The "competition" section of the document repeatedly states that there will be no impact. These statements are at odds with Verisign's apparent desire to terminate the (relatively unpopular) 3rd-level domains so that it may profit by selling (more desirable) 2nd-level domains at a higher cost.

All of these problems are being weighed against a very flimsy stated benefit.

Verisign merely stated that termination of this service "will increase efficiency for the operation of the .name TLD". That's the sole rationale Verisign provided for this incredibly destructive action.

ICANN staff accepted the Verisign proposal that was deeply flawed, hereby violating many of ICANN's most fundamental obligations.

9. What are you asking ICANN to do now?

Either one of the following actions would be satisfactory:

- Reverse the approval to terminate the 3rd-level .name domains.
- Ensure that owners of 3rd-level .name domains have a right of first refusal at the 3rd-level .name domain's current pricing level for purchasing the corresponding 2nd-level .name in the order of registration.

In any event, until satisfactory action is taken, ICANN should suspend its approval of RSEP-2026013.

10. Please state specifically the grounds under which you have the standing and the right to assert this Reconsideration Request, and the grounds or justifications that support your request.

(a) Requestor's standing and material adverse impact

As explained under sections 6 and 11, the Requestor and the nine individuals that Requestor represents are materially impacted by the challenged decision.

(b) ICANN's fundamental obligations

ICANN's mission, fundamental obligations, and the limits of its authority are defined in ICANN's Articles of Incorporation, Bylaws and agreements.

Pursuant to Article III of the Articles of Incorporation, ICANN 'shall operate in a manner consistent with these Articles and its Bylaws for the benefit of the Internet community as a whole, carrying out its activities in conformity with relevant principles of international law and international conventions and applicable local law and through open and transparent processes that enable competition and open entry in Internet-related markets'.

This commitment is reiterated in Article I(2)(a) Bylaws.

Pursuant to Article I(2) Bylaws, ICANN must 'act in a manner that complies with and

reflects ICANN's Commitments and respects ICANN's Core Values.' ICANN's Commitments and Core Values include the obligations to 'preserve and enhance the administration of the DNS and the operational stability, reliability, security, global interoperability, resilience, and openness of the DNS and the Internet', 'maintain the capacity and ability to coordinate the DNS at the overall level and work for the maintenance of a single, interoperable Internet', 'employ open, transparent and bottom-up, multistakeholder policy development processes that are led by the private sector (including business stakeholders, civil society, the technical community, academia, and end users), while duly taking into account the public policy advice of governments and public authorities. These processes shall (A) seek input from the public, for whose benefit ICANN in all events shall act, (B) promote well-informed decisions based on expert advice, and (C) ensure that those entities most affected can assist in the policy development process.'

Article I(2)(v) and (vi) Bylaws mandate ICANN to 'make decisions by applying documented policies consistently, neutrally, objectively, and fairly, without singling out any particular party for discriminatory treatment' and to 'remain accountable to the Internet community'.

A cornerstone for ICANN's decision-making process that is essential to comply with its commitment to remain accountable, is ICANN's obligation to operate in an open, transparent and fair manner. Article III(1) Bylaws provide that ICANN and its constituent bodies 'shall operate to the maximum extent feasible in an open and transparent manner and consistent with procedures designed to ensure fairness'.

ICANN is subject to a fundamental obligation to act equitably and fairly and apply established policies neutrally and without discrimination. Article II(3) Bylaws provides:

‘ICANN shall not apply its standards, policies, procedures, or practices inequitably or single out any particular party for disparate treatment unless justified by substantial and reasonable cause, such as the promotion of effective competition.’

The abovementioned fundamental obligations of transparency, fair and equitable treatment, and non-discrimination exist since ICANN’s incorporation in 1998 and were never changed. These principles are also rooted in customary international law, that ICANN must comply with.

Section 1.2(b)(viii) Bylaws identifies as a Core Value, within the scope of ICANN’s Mission and other Core Values, 'respecting internationally recognized human rights as required by applicable law'. ICANN’s Human Rights Framework of Interpretation (HR-FOI) confirms that in order to respect human rights, ICANN 'should avoid violating human rights and take human rights into account [...] in its decision-making processes'. It further expressly recognizes that internationally recognized human rights, including those expressed in the Universal Declaration of Human Rights ('UDHR'), can guide ICANN’s decisions and actions. For those human rights that are recognized principles of customary international law, such as the right to property, ICANN must respect them.

(c) Summary of ICANN’s breaches

ICANN has violated the principles listed above by accepting RSEP-2026013.

ICANN’s acceptance of RSEP-2026013 effectively comes down to authorizing and facilitating an illegal expropriation, for which there is no public purpose or interest, without due process, and without prompt, adequate and effective compensation.

ICANN has violated both Requestor’s procedural and substantive rights by accepting RSEP-2026013 through a process that was neither transparent nor substantively fit for

the purpose for which the RSEP was developed.

(d) ICANN violates its human rights obligations by authorizing and facilitating an illegal expropriation

The protection against arbitrary deprivation of property is an internationally recognized human right. Article 17 of the Universal Declaration of Human Rights provides that ‘[n]o one shall be arbitrarily deprived of his property’. Article 1 of Protocol No. 1 to the European Convention on Human Rights (‘ECHR’) provides that: ‘[e]very natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.’

Domain names have specifically been recognized as constituting property, both under U.S. (Californian)¹ and EU law².

By accepting RSEP-2026013, ICANN allows for the termination of existing domain name registrations, including some held by Requestor, thereby permanently extinguishing Requestor's exclusive rights to these domain names without any compensation.

(e) ICANN violated Requestor's procedural rights

The process was procedurally defective. The RSEP was developed as a consensus policy through ICANN's multistakeholder model to enable registry operators to submit proposed registry-service changes to ICANN for evaluation of potential significant security, stability, and competition issues. ICANN itself describes the purpose of the policy as creating an environment in which registry operators are

¹ *Kremen v. Cohen*, 337 F. 3d 1024 - Court of Appeals, 9th Circuit 2003.

² ECtHR, *Paeffgen GmbH v. Germany*, App. Nos. 25379/04, 21688/05, 21722/05 and 21770/05, 18 September 2007.

encouraged to discuss changes that may affect third parties with ICANN before they are implemented. This purpose presupposes prior scrutiny, meaningful disclosure, and an opportunity for affected parties and the Internet community to understand the nature and consequences of the proposed change. Here, that did not happen. Many of the relevant documents and analyses were not shared with Requestor or the affected registrants. Verisign claims that it discussed its proposal with registrars, but Requestor is offered no data to support such a claim. No prior notice was given to those whose long-standing domain name registrations would be deleted. ICANN therefore deprived the persons most directly affected by the decision of any useful opportunity to assist in the decision-making process, even though ICANN's Bylaws require open, transparent, and bottom-up processes that seek public input, promote well-informed decisions, and ensure that those most affected can participate.

(f) *The RSEP process may not be used for authorizing the deletion of existing domain name registrations*

ICANN exceeded the proper scope of the RSEP process. The RSEP is designed to evaluate whether adding, modifying, or removing a "Registry Service" raises significant security, stability, or competition issues. It is not designed to authorize the forced deletion of existing domain name registrations, nor to permit a registry operator to extinguish rights and Internet identities that registrants have built and paid for over many years. A proposal that 'existing third level domain name registrations will be deleted' is not merely a technical adjustment to a registry service. It is a fundamental change to the availability and continuity of domain name registrations themselves. Such a measure affects acquired interests, online identity, access to email, websites, and related services, and creates security and identity-theft risks for registrants and Internet users. Treating that measure as a routine removal of a registry service collapses the distinction between a service-level operational change and the

elimination of domain name registrations. The RSEP process was not developed for, and cannot lawfully be used as, a mechanism to remove or cancel existing registrations.

Recording and maintaining domain name registrations is the core function governed by the registry agreement. The RSEP process should not be interpreted so as allowing that process to be used to undermine, or destroy that subject matter.

Paragraphs 5 and 6 of Reconsideration Request 26-7 are incorporated herein by reference.

(g) ICANN's misuse of the RSEP process violates ICANN's substantive obligations

The misuse of the RSEP process also violates ICANN's substantive obligations. ICANN was created as a nonprofit public-benefit corporation to promote the global public interest in the operational stability of the Internet and to operate for the benefit of the Internet community as a whole. Its mission and commitments require it to preserve and enhance the stability, reliability, security, global interoperability, resilience, and openness of the DNS and the Internet. These obligations are not narrow technical slogans. They must be interpreted broadly, consistently with ICANN's public-benefit role and with the reliance that individual Internet users place on stable domain name registrations. "Openness" includes not only the technical ability of systems to resolve names, but also the practical, economic, and social ability of users to access, maintain, and use Internet identifiers without arbitrary or non-transparent interference. ICANN's commitment to Internet openness has multiple dimensions, including technical, economic, governance, legal, and user-facing dimensions. It therefore covers open access to Internet-related markets, regulatory transparency, and the ability of users to maintain meaningful access to the Internet

through the identifiers on which they rely.

ICANN's approval is inconsistent with those obligations because it facilitates the shutdown of functioning domain names, reduces rather than preserves openness, and undermines rather than enhances interoperability and user access. A domain name is an Internet identifier through which users access websites, email, APIs, accounts, and devices. Deleting existing registrations severs those connections. It does not preserve or enhance the DNS; it removes working identifiers from the Internet. It does not promote open access; it deprives existing users of access to their established Internet presence. It does not protect interoperability; it disrupts the ability of third-party services, devices, and users to continue interacting with the same stable identifiers. And it does not serve the Internet community as a whole; it privileges Verisign's asserted operational convenience over the reliance interests, security, and continuity needs of thousands of existing registrants and the users who interact with them.

(h) ICANN failed to adequately consider material information and relied on false or inaccurate relevant information

Even if the RSEP were capable of applying to a proposal of this nature (*quod non*), ICANN failed to follow the requirements of that process.

As explained above, Verisign's proposal raises obvious and substantial security concerns. Under paragraph 2.6 of the RSEP, proposals that may raise significant security or stability issues must be referred to the Registry Services Technical Evaluation Panel ("RSTEP") for independent technical review. That did not occur.

The security implications of the proposal are neither speculative nor remote.

Paragraph 1.3 of the RSTEP process defines security issues to include 'unauthorized access to or disclosure of information or resources on the Internet by systems operating in accordance with all applicable standards.' That is precisely the

consequence that may result from the deletion of existing third-level .name registrations and the subsequent release of the corresponding second-level domains. Once those domains are registered by third parties, Internet systems operating exactly as intended and in accordance with established standards may route email, authentication requests, account recovery messages, API calls, and other communications to persons who are not the intended recipients. The result is unauthorized access to information, services, accounts, and devices, with potentially severe consequences for affected registrants and third parties.

These risks go to the heart of the security and stability considerations that the RSTEP mechanism was created to assess. They are neither incidental nor peripheral to the proposal. On any reasonable interpretation of the RSEP, a proposal carrying such consequences could not properly be approved without referral to the RSTEP for independent evaluation. By approving RSEP-2026013 without obtaining such review, ICANN failed to follow the procedures prescribed by its own policy.

Accordingly, even if the RSEP were assumed to be applicable (*quod non*), the challenged decision would still be inconsistent with the RSEP framework itself. ICANN therefore failed to apply its documented policies consistently and fairly, providing an independent ground for reconsideration under Article 4, Section 4.2(c)(i) of the Bylaws.

Even if the security concerns identified in this Request were ultimately considered not to justify rejection of the proposal, the challenged decision nevertheless raises a serious question as to whether ICANN was provided with, and properly considered, all material information relevant to its decision. As explained above, the consequences described in this Request are neither remote nor speculative.

It is difficult to reconcile the existence of such obvious and substantial security implications with the approval of RSEP-2026013. Either the relevant information was not before the ICANN staff who approved the request, or it was not adequately considered in the decision-making process. If the former is correct, the challenged decision was taken without consideration of material information. If the latter is correct, the decision reflects a failure to properly evaluate information that was plainly material to the security and stability issues raised by the proposal. In either case, the requirements of the RSEP framework and ICANN's broader obligations under its Articles and Bylaws were not satisfied.

The materiality of the omitted or disregarded information is self-evident. The proposal affects thousands of existing domain name registrations and creates foreseeable risks of unauthorized access to information, services, accounts and devices. These are precisely the types of consequences that the RSEP and RSTEP processes were designed to identify and assess before implementation. Accordingly, the challenged decision was taken without due consideration of material information, providing an independent basis for reconsideration under Article 4, Section 4.2(c)(ii) of the Bylaws.

There is a further and separate issue concerning the provision of false or inaccurate relevant information by Verisign. Given the nature of the proposal and Verisign's position as registry operator, it is difficult to accept that the security implications described above were unknown or unforeseeable. Paragraph 2.3 of the RSEP requires the registry operator to provide ICANN with sufficient information regarding the proposed change to enable ICANN to assess whether the change should be subject to the approval process, including a technical description of the change as experienced by external users and an assessment of its impact on those users.

Verisign did not provide ICANN with such information. To the contrary, the submission omitted any meaningful discussion of the security consequences for existing registrants and third parties. Moreover, in response to Question 7.3, which specifically invited the submission of any other relevant information, Verisign responded that there was none. Whether deliberate or inadvertent, that response conveyed the misleading impression that no additional information existed that was relevant to ICANN's assessment of the proposal.

The security, stability and user-impact issues identified in this Request were plainly relevant to ICANN's evaluation of the proposal. The failure to disclose those issues, coupled with the representation that no further relevant information existed, resulted in ICANN being provided with false or inaccurate relevant information, or at the very least materially incomplete information. That provides a further and independent ground for reconsideration under Article 4, Section 4.2(c)(iii) of the Bylaws.

(i) Conclusion

For these reasons, ICANN's acceptance of RSEP-2026013 was both procedurally and substantively unlawful. Procedurally, ICANN failed to provide the transparency, prior notice, disclosure, and meaningful participation required by its Articles and Bylaws. Substantively, ICANN used a process designed for evaluating registry services to approve the deletion of existing domain name registrations, contrary to ICANN's public-benefit purpose, its fundamental obligation to fair and equitable treatment, its commitments to openness, open access, interoperability, security, stability, and the interests of the Internet community as a whole.

11. Are you bringing this Reconsideration Request on behalf of multiple persons or entities? (Check one)

☒ Yes

☐ No

11a. If yes, is the causal connection between the circumstances of the Reconsideration Request and the harm substantially the same for all of the Requestors? Explain.

Requestor represents nine individuals who have had 3rd-level domains for over 10 years (see table below). They will all lose the Internet presences we have built up in that time. They are also threatened with the risk of comprehensive identity theft once the 2nd-level domains become available. They have paid for these domains for up to ten years into the future.

The owners of the following domains have consented in writing for Requestor to represent them in this matter. They all face termination of their Internet presence in February 2027. This is a continuously growing list.

Domain	Created	Expires
neil.fraser.name	2002-01-23T14:41:45Z	2036-01-29T00:00:00Z
beverly.fraser.name	2016-03-21T21:28:55Z	2030-03-21T21:28:55Z
pablo.rauzy.name	2007-09-21T17:41:37Z	2027-09-21T17:41:37Z
paul.kishimoto.name	2006-07-13T04:01:36Z	2035-07-13T04:01:36Z
matija.suklje.name	2008-05-23T06:38:38Z	2028-05-23T06:38:38Z
daniel.gnoutcheff.name	2009-09-11T01:44:47Z	2031-09-11T01:44:49Z
larry.truesdale.name	2003-06-18T06:53:39Z	2029-06-18T06:53:39Z
lionel.alberti.name	2005-07-15T12:35:50Z	2027-07-15T12:35:50Z
tyler.macdonald.name	2007-12-23T17:25:54Z	2027-12-23T17:25:54Z

Additionally, there are 22,000 other domain owners with similar issues. Many of whom are completely unaware of what's about to happen.

12. Are you bringing this Reconsideration Request on an urgent basis pursuant to Article 4, Section 4.2(s) of the Bylaws?

☐ Yes (I affirm the above criteria have been met.)

☒ No

12a. If yes, please explain how the Reconsideration Request meets the criteria for urgent treatment and the basis for seeking urgent treatment.

13. Do you have any documents you want to provide to ICANN?

N/A

Terms and Conditions for Submission of Reconsideration Requests

Reconsideration Requests from different Requestors may be considered in the same proceeding so long as: (i) the requests involve the same general ICANN Board or staff action or inaction; and (ii) the Requestors are similarly affected by such action or inaction. In addition, consolidated filings may be appropriate if the alleged causal connection and the resulting harm is substantially the same for all of the Requestors. Every Requestor must be able to demonstrate that it has been materially harmed and adversely impacted by the ICANN Board or staff action or inaction giving rise to the request.

The BAMC shall review each Reconsideration Request upon its receipt to determine if it is sufficiently stated. The BAMC may summarily dismiss a Reconsideration Request if: (i) the Requestor fails to meet the requirements for bringing a Reconsideration Request; or (ii) it is frivolous. The BAMC's summary dismissal of a Reconsideration Request shall be documented and promptly posted on the Reconsideration webpage at

<https://www.icann.org/resources/pages/accountability/reconsideration-en>.

Hearings are not required in the Reconsideration Process; however, Requestors may ask for the opportunity to be heard. The BAMC retains the absolute discretion to determine whether a hearing is appropriate, and to call people before it for a hearing. The BAMC's decision on any such request is final.

For all Reconsideration Requests that are not summarily dismissed, except where the Ombudsman is required to recuse himself or herself and Community Reconsideration Requests, the Reconsideration Request shall be sent to the Ombudsman, who shall promptly proceed to review and consider the Reconsideration Request. The BAMC shall make a final recommendation to the Board with respect to a Reconsideration Request following its receipt of the Ombudsman's evaluation (or following receipt of the Reconsideration Request involving those matters for which the Ombudsman recuses himself or herself or the receipt of a Community Reconsideration Request, if applicable).

The final recommendation of the BAMC shall be documented and promptly (i.e.,

as soon as practicable) posted on the Reconsideration webpage at <https://www.icann.org/resources/pages/accountability/reconsideration-en> and shall address each of the arguments raised in the Reconsideration Request. The Requestor may file a 10-page (double-spaced, 12-point font) document, not including exhibits, in rebuttal to the BAMC's recommendation within 15 days of receipt of the recommendation, which shall also be promptly (i.e., as soon as practicable) posted to the ICANN Reconsideration webpage and provided to the Board for its evaluation; provided, that such rebuttal shall: (i) be limited to rebutting or contradicting the issues raised in the BAMC's final recommendation; and (ii) not offer new evidence to support an argument made in the Requestor's original Reconsideration Request that the Requestor could have provided when the Requestor initially submitted the Reconsideration Request.

The ICANN Board shall not be bound to follow the recommendations of the BAMC. The ICANN Board's decision on the BAMC's recommendation is final and not subject to a Reconsideration Request.

By submitting my personal data, I agree that my personal data will be processed in accordance with the ICANN [Privacy Policy](#), and agree to abide by the website [Terms of Service](#).

Respectfully submitted on behalf of Requestor,

25 September 2026



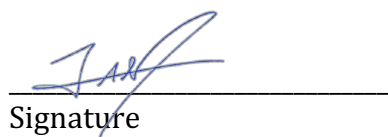
Signature

Date

Flip Petillion

Print Name

25 September 2026



Signature

Date

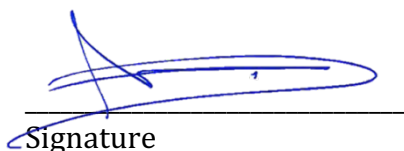
Jan Janssen

Print Name

Jan
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25 September 2026



Signature

Date

Diégo Noesen

Print Name