

## МИНИСТЕРСТВО ЦИФРОВОГО РАЗВИТИЯ, СВЯЗИ И МАССОВЫХ КОММУНИКАЦИЙ РОССИЙСКОЙ ФЕДЕРАЦИИ

## MINISTRY OF DIGITAL DEVELOPMENT, COMMUNICATIONS AND MASS MEDIA OF THE RUSSIAN FEDERATION

Пресненская наб., д.10, стр.2, Москва, 123112

Presnenskaya Embankment 10, building 2, Moscow, 123112, Russian Federation

<u>№</u> <u>П17-270038</u> « » <u>07.06.2024</u>

Ms. Tripti Sinha,

Chair, ICANN Board of Directors

E-mail: Tripti.Sinha@board.icann.org

Dear Ms. Sinha,

I am writing to you due to concerns regarding the suspension of service in 2023 and to this day for customers from a number of countries, including the Russian Federation, in the top-level domain zone ".aero", which is the international industry domain for civil aviation. The international aviation domain zone ".aero" has been in operation since 2002 and is intended only for airlines, airports, space and aircraft industries, flying clubs, air cargo transportation, as well as industry associations.

As of November 10, 2023, SITA, the administrator of the ".aero" domain zone, has stopped accepting orders for registration and renewal of domain registration in the domain zone ".aero" to clients from the Russian Federation. Moreover, SITA notified the Russian party after the fact of the suspension, and not in advance. The information letter was sent on the same day, November 10, 2023, to the registrar RU-CENTER, which registers domain names in the ".aero" zone in the Russian Federation.

The names of more than 400 Russian clients are registered in the .aero domain zone, including more than 30 airports and 15 airlines. Lack of access to this zone will require the transfer of Internet resources to other domain zones and the expenditure of resources on informing users about new Internet addresses.

We believe that this decision is unjustified and contradicts the principles of equality and openness that ICANN follows and which shall be respected within the international aviation industry.

We would like to draw your attention to the fact that none of the points in SITA's "aero" Domain Management Policy were violated by Russian clients. All procedures provided for in this Policy have been followed. At the same time, Russian clients regularly paid all the necessary duties and financial charges. There were also no obvious actions that could lead to denial of registration in the "aero" zone.

<sup>&</sup>lt;sup>1</sup> Domain Management Policy // URL: <a href="https://information.aero/registration/policies/dmp">https://information.aero/registration/policies/dmp</a>

Please also note that the TLD Sponsorship Registry Agreement<sup>2</sup> was concluded between Internet Corporation for Assigned Names and Numbers and the "aero" domain registrar – an American division of SITA (SITA Information Networking Computing USA, Inc.), registered in the state of Delaware, USA. Services for registration and renewal of domain names are specifically and separately exempted from sanctions by General License No. 25C<sup>3</sup>, para (b) of the Office of Foreign Assets Control sanctions list, therefore, the risk of sanctions mentioned in the information letter is completely unfounded and solely malicious.

We note that SITA, as the registrar of the ".aero" domain zone, does not have the right to make arbitrary decisions and shall be guided by ICANN policies, which do not provide for indiscriminate blocking of customers based on territorial, national or other general characteristics.

We are ready to discuss possible ways to resolve the situation. Restoring access for Russian clients to the ".aero" domain zone will contribute to the development of the international aviation industry and strengthen cooperation between all market participants.

Sincerely yours,



Andrei Zhivov Deputy Director of Department of the Development of Mass Media and International Cooperation, GAC Russia Representative

<sup>&</sup>lt;sup>2</sup> .AERO TLD Sponsorship Registry Agreement // URL: <a href="https://itp.cdn.icann.org/en/files/registry-agreements/aero/aero-agmt-html-10sep21-en.htm">https://itp.cdn.icann.org/en/files/registry-agreements/aero/aero-agmt-html-10sep21-en.htm</a>

<sup>&</sup>lt;sup>3</sup> GENERAL LICENSE NO. 25C Authorizing Transactions Related to Telecommunications and Certain Internet-Based Communications // URL: <a href="https://ofac.treasury.gov/media/924326/download?inline">https://ofac.treasury.gov/media/924326/download?inline</a>