

November 22, 2019

Internet Society  
Attn: Andrew Sullivan, President and CEO  
11710 Plaza America Drive, Suite 400  
Reston, VA 20190

Dear Mr. Sullivan,

We urge you to stop the sale of the Public Interest Registry (PIR) to Ethos Capital.

Non-governmental organizations all over the world rely on the .ORG top-level domain. Decisions affecting .ORG must be made with the consultation of the NGO community, overseen by a trusted community leader. If the Internet Society (ISOC) can no longer be that leader, it should work with the NGO community and the Internet Corporation for Assigned Names and Numbers (ICANN) to find an appropriate replacement.

The 2019 .ORG Registry Agreement represents a significant departure from .ORG's 34-year history. It gives the registry the power to make several policy decisions that would be detrimental to the .ORG community:

- **The power to raise .ORG registration fees without the approval of ICANN or the .ORG community.** A .ORG price hike would put many cash-strapped NGOs in the difficult position of either paying the increased fees or losing the legitimacy and brand recognition of a .ORG domain.
- **The power to develop and implement Rights Protection Mechanisms unilaterally, without consulting the .ORG community.** If such mechanisms are not carefully crafted in collaboration with the NGO community, they risk censoring completely legal nonprofit activities.
- **The power to implement processes to suspend domain names based on accusations of “activity contrary to applicable law.”** The .ORG registry should not implement such processes without understanding how state actors frequently target NGOs with allegations of illegal activity.

A registry could abuse these powers to do significant harm to the global NGO sector, intentionally or not. We cannot afford to put them into the hands of a private equity firm that has not earned the trust of the NGO community. .ORG must be managed by a leader that puts the needs of NGOs over profits.

When ISOC originally proposed transferring management of .ORG to PIR in 2002, ISOC's then President and CEO Lynn St. Amour promised that .ORG would continue to be driven by the NGO community—in her words, PIR would “draw upon the resources of ISOC's extended global network to drive policy and management.” As long-time members of that global network, we insist that you keep that promise.

American Alliance of Museums  
American Society of Association Executives  
Aspiration  
Association of Junior Leagues International, Inc.  
Creative Commons  
Crisis Text Line  
Demand Progress Education Fund  
DoSomething.org  
Electronic Frontier Foundation  
European Climate Foundation  
Free Software Foundation  
Girl Scouts of the USA  
Independent Sector  
Internet Archive  
Meals on Wheels America  
National Council of Nonprofits  
National Human Services Assembly  
NTEN  
Palante Technology Cooperative  
Public Knowledge  
R Street Institute  
TechSoup  
VolunteerMatch  
Volunteers of America  
Wikimedia Foundation  
YMCA of the USA  
YWCA USA