

As Chair of the usTLD Stakeholder Council, I write to request the permanent suspension of the kids.us third-level namespace through the end of the existing contract period, including any option period.

A temporary suspension of the kids.us namespace has been in effect since 2012. The suspension was instated due to low registration in and usage of kids.us and the perceived inability to expand such usage within the restrictive policy framework set forth in the 2002 Kids.us Implementation and Efficiency Act. The request to temporarily suspend the kids.us namespace followed a dramatic decline in its usage. Utilization of the kids.us peaked in 2004, with 1,505, but only 23 active websites. Comparatively, by 2011, the number of registrations was reduced to 651, with only six active websites notwithstanding dramatic reductions in the price of kids.us domains and grassroots efforts to promote its usage directly to children's content providers. Further, each of these six websites had a more robust presence elsewhere on the web, due in part to the aggressive restrictions on kids.us. In aggregate, these sites garnered only 470 unique visitors per year.

Since then, great efforts have been undertaken to explore the history and context around kids.us and its suspension, as well as to explore the viability of re-launching the namespace to greater success. Most notably, in 2014, Neustar convened the Kids.us Education Advisory Committee to consider the ongoing suspension of the namespace, and whether that suspension should remain in place. The Committee also discussed at length possible initiatives that Neustar and the usTLD Stakeholder Council could undertake to foster high-quality, educational content in .US, both within and outside the Kids.us third level namespace.

The Kids.us Education Advisory Committee explored trends in online content, internet usage, and technology that contributed to the decline of the kids.us namespace and compared this experience with that of other proprietary online spaces for kids. It found that other walled spaces had generally suffered a similar fate to the kids.us namespace, even when they were well-funded and supported by strong content partnerships. Further, the Committee determined that restricting kids' internet usage to a single namespace was no longer practical, beneficial, or necessary given the availability of new tools through which parents and teachers could control internet usage across all namespaces, and the proliferation of good content across the Web.

The members of the Kids.us Education Advisory Committee concluded that the policy framework for kids.us was unsupportive, unnecessary to provide positive online experiences for kids. Regardless of efforts to rebrand the space, the requirement to do so within the existing policy restrictions would inhibit utilization by kids; would prevent the development of strong content partnerships. As such, the Kids.us Education Advisory Committee recommended to the usTLD Stakeholder Council:

- [That] the kids.us domain and the associated namespace should remain suspended; and
- [That] Neustar, in collaboration with the usTLD Stakeholder Council, should seek to promote safe, positive, and educational experiences for children online guided by the operational principles identified by the Education Advisory Committee.

The report of the Advisory Committee also described a number of possible efforts that could be taken up to promote positive experiences for kids within .US, and operating principles that should guide

further development of these initiatives. The most important such principles were that any efforts to promote digital literacy or quality content for kids should be cost-efficient and not duplicate efforts already underway elsewhere on the web. Kids.us was determined to meet neither of these principles.

The recommendations of the Kids.us Education Advisory Committee have been duly considered by members of the usTLD Stakeholder Council and by the wider .US Stakeholder Community. Members of the usTLD Stakeholder Council have reviewed the Kids.us Education Advisory Committee Report and discussed the report's recommendations on monthly meetings of the usTLD Stakeholder Council and on the council listserv. In these discussions, the primary recommendation of the Kids.us Education Advisory Committee, to maintain the ongoing suspension of kids.us, was universally supported by members of the usTLD Stakeholder Council.

Further, in accordance with its operating procedures, the usTLD Stakeholder Council held a comment period from May 14 through June 13, 2015 to seek public input on the proposed recommendation to continue the suspension of the kids.us namespace. The usTLD Stakeholder Council received one public comment on the proposed suspension from James Gannon of Cyber Invasion Limited. The comment by Mr. Gannon supported the continued suspension of kids.us, but recommended an annual review by the Council to determine whether continued suspension is warranted. The usTLD Stakeholder Council reviewed and discussed Mr. Gannon's comment. The Council does not believe that a regular annual review to reconsider the suspension is warranted, but rather that a review should be undertaken if there is a significant change in the .US TLD. In response to the comment, the Council has asked to be notified by the Secretariat each year of the submission of the Annual Kids.us Report to Congress, at which point the Council will determine whether a review of the suspension is warranted.

As a Council, discussing and advancing initiatives through which .US promote quality content for children, support digital literacy, and help prepare America's next generation to compete in the digital economy are of the utmost priority. The historical experience of kids.us has shown that these aims cannot be readily met under the strict legal restrictions established for kids.us. We feel strongly that these goals will be more effectively met outside of the kids.us third-level namespace, and that they are consistent with this request for a permanent suspension of kids.us. As such, we request that the Department of Commerce grant a suspension of the kids.us namespace through the existing contract term, including any option periods.

We thank you for your consideration of this request.