

APPENDIX 6**Affidavit**

Knowing the criminal liability of making an inaccurate affidavit and aware that the following declaration is intended for submission to the court, I

Sara Scruton, 

declare the following:

I am a Senior Compliance Officer at Tucows, Inc. ("Tucows") and am responsible, among other things, for handling abuse complaints and disputes in connection with the ICANN Uniform Dispute Resolution Policy. As part of my duties, I deal with compliance cases from all business units, including those of the Defendant in this case, EPAG Domainservices GmbH ("EPAG").

Since the conversion of the systems and Whois expenses for EPAG and our other registrars on May 25, we have been informed about the start of 25 UDRP-proceedings against a domain holder with a domain in the administration of Tucows (OpenSRS, Enom, EPAG). 7 of these cases are directed against domains registered in the EU. All of these UDRP procedures are proceeding in the usual manner, without any interference due to our system changes. Two (2) of these UDRP procedures relate only to domains at EPAG, one of which concerns a person in the EU.

During the same period, we investigated 802 complaints alleging phishing through a domain in the administration of Tucows (OpenSRS, Enom, EPAG). These investigations have led to the deactivation of 614 domain names. 172 of these phishing complaints were accusations against domain holders in the EU. EPAG has received eight (8) phishing complaints, all have been investigated, and in seven (7) cases the domain was deactivated. Three (3) of these phishing complaints concerned persons in the EU.

From my experience working for the company, these figures are common for regular business operations, and the lack of availability of data for Admin-C and Tech-C for complaint handling has not affected our ability to handle such compliance cases in any way.

Furthermore, I can confirm that there is currently no industry standard by which consent to the collection of data for the Admin-C or the Tech-C can be given and verified beyond the parties involved.

Toronto, 10 July 2018

Signature

