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March 3, 2016

BY E-MAIL

ICANN Board Governance Committee  
*Attn:* Mr. Chris Disspain, Chair  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
[reconsideration@icann.org](mailto:reconsideration@icann.org)

Re: Reconsideration Request 15-17: American Institute of Certified Public Accountants

Dear Members of the Board Governance Committee:

On behalf of Trixy Canyon, LLC (“Trixy Canyon”) we write to you concerning a Reconsideration Request (“Request”) submitted by the American Institute of Certified Public Accountants (“AICPA” or “Requestor”) that seeks to overturn the Community Priority Evaluation determination for the proposed top-level domain .CPA. See <https://www.icann.org/resources/pages/reconsideration-15-17-aicpa-2015-09-25-en>.

Specifically, Requestor AICPA has asked the BGC for an “in-person hearing to address the matters set forth in [the Request].” See Request at 13. Requestor argues that such a hearing is necessary due to the “complexity and importance of the policy and procedural issues raised in [the Request].” *Ibid*. Trixy Canyon respectfully notes that decisions concerning Reconsideration Requests typically do not require a separate “in-person hearing,” and AICPA does not provide any specific and detailed rationale to justify special treatment here. As such, the request for hearing should be denied.

However, should the BGC be inclined to grant AICPA’s request and hold a hearing, Trixy Canyon, another applicant for .CPA, respectfully asks for an opportunity to be heard at these proceedings.

Sincerely,

/dcm/

Don C. Moody  
of The IP and Technology Legal Group, P.C.

cc: jmg/client/file