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March 17, 2008

VIA EMAIL & FIRST CLASS MAIL

Robert P. McHale, Esq.
One Financial Center
Boston, Massachusetts 02111

Re: Your letter dated March 3, 2008 regarding Dean Anderson

Dear Mr. McHale:

We have reviewed your letter dated March 3, 2008, arguing that Mr. Anderson's posting rights on ARIN lists should be restored.

First, ARIN will restore Mr. Anderson's rights to make postings consistent with the terms of my letter dated February 6, 2008, which indicated these rights would be restored on April 8, 2008. Mr. Anderson will also be permitted to participate in the upcoming Denver meeting if he chooses to do so. This may change depending on Mr. Anderson's conduct.

Second, your assertion that Mr. Anderson is not bound by ARIN's Acceptable Use Policy ("AUP") because he has not voluntarily agreed, or signed up in some way to the AUP, is mistaken. The AUP is part of ARIN's relationship with Mr. Anderson so long as he utilizes an ARIN list. Mr. Anderson must abide by the AUP in existence at any point when he seeks the privilege of utilizing ARIN's lists.

Third, for some time ARIN has been concerned that Mr. Anderson's actions on public lists and elsewhere raise questions as to whether he has tortiously interfered with ARIN's right to contract with its members. The very email you sent us demonstrates Mr. Anderson is busily trying to interfere with ARIN's right to contract with other members of the community. Any continued interference in these relationships could become the subject of litigation if Mr. Anderson persists in this conduct.

Finally, we respectfully request that you counsel your client to avoid future violations of the AUP that could result in his being permanently banned from any ARIN list. Mr. Anderson does not have a right to force ARIN or others to associate with him under his terms rather than ARIN's. Mr. Anderson has been banned from many other organizations because of his conduct, and further violations of the ARIN AUP will not be tolerated, given his prior record in this matter.

U.S. practice conducted through McDermott Will & Emery LLP.

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Your letter threatened litigation to restore Mr. Anderson's right to post. ARIN will see you in court if you choose to go that route.

Sincerely,

A handwritten signature in black ink, appearing to read "M.P. Socarras". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Socarras