

**IN THE MATTER OF AN INDEPENDENT REVIEW PROCESS BEFORE THE  
INTERNATIONAL CENTRE FOR DISPUTE RESOLUTION**

Namecheap, Inc. (Namecheap)	)	
	)	
4600 East Washington Street, Suite 305	)	
Phoenix, AZ 85034	)	
	)	
<b>Claimant</b>	)	
	)	
v.	)	<b>ICDR Case No. 01-20-0000-6787</b>
	)	
Internet Corporation For	)	
Assigned Names and Numbers	)	
(ICANN)	)	
	)	
12025 Waterfront Drive, Suite 300	)	
Los Angeles, CA 90094-2536	)	
	)	
<b>Respondent</b>	)	
_____	)	

**AFFIDAVIT OF MARYNA ZHURAVLOVA IN SUPPORT OF NAMECHEAP’S  
REQUEST FOR INDEPENDENT REVIEW PROCESS**

I, Maryna Zhuravlova, affirm that:

1. I am Head of Marketing of Namecheap, Inc., the Claimant (Namecheap).
2. I have been Head of Marketing of Namecheap since 2019, and have worked with Namecheap in various capacities since June 2014.
3. As part of my role as Head of Marketing, I examine customer behavior, I study the effects of efficient domain name portfolio management on businesses, and I have my team apply this know how in marketing material and business advice to Namecheap customers, including on Search Engine Optimization (SEO).
4. Based on my experience, knowledge of the industry, and literature, it is my professional opinion that moving a website from one TLD to another is a complicated and “painful” procedure in Search Engine Optimization (SEO). The main danger here is a critical loss of

traffic from organic search and significant problems with ranking keywords, even if one follows all the steps in strict accordance with Google's instructions for developers which can be accessed at the date of making this statement at [https://developers.google.com/search/docs/advanced/crawling/site-move-with-url-changes?visit\\_id=637429373471155404-2463881620&rd=1#start-site-move](https://developers.google.com/search/docs/advanced/crawling/site-move-with-url-changes?visit_id=637429373471155404-2463881620&rd=1#start-site-move).

5. Once a website has been moved from one TLD to another, the website will receive less traffic for a certain amount of time necessary for the search engine to rebuild the index. My experience in assisting customers in switching TLDs shows that the average position on the website as a whole will decrease by at least 1-2 positions in the Search Engine results page and may not recover for several weeks, if ever. That is because an important part of recovery is to have the original domain name registered for a period of time during the transition from one domain to another.

6. The adverse effects of moving a website from one TLD to another can be tempered via a so-called '301 Redirect'. A 301 Redirect is a permanent redirect from one domain name to another, which passes between 90-99% of the link equity (ranking power) to the redirected page. If a registrant does not have the opportunity to set up 301 redirects, since they are not able to continue registering their previous domain name, the negative effect of transferring the site to a new TLD will be drastic. It is not a coincidence that in the Google manual, setting up redirects is made as a separate and integral step, as is shown in Appendix 1 to this Affidavit. An effective 301 Redirect requires that you have the old domain permanently pointing to the new domain, which would require you to continue to purchase the old domain. Hence, if someone is switching domain names because their existing domain name is no longer affordable to them, they will not be able to do a 301 Redirect, and thus, will be dramatically impacted by the change in their SEO rankings.

7. Without a 301 Redirect, a website linked to a different TLD will lose all current traffic,

current positions, and incoming links. If no request is sent to remove the old site from the Google index, it will still be in the cache of the search engine for some time, which will interfere with the correct assessment of the recovery process from the move to a different TLD. The recovery process could take months or even years for registrants operating a large site with a competitive topic.

8. There are additional barriers to switching for consumers, which are the security concerns associated with changing an established domain. Given that Namecheap customers often rely heavily on email addresses as a means of communication with their own clients, they would lose access to their historical email address, severing this line of communication, which could cause confusion, missed opportunities, or a breakdown in their ability to service their clients. Additionally, there is the possibility for a bad actor to purchase the previous domain name and use it to further create confusion, or for phishing or spamming end clients.

9. This is further evidence of the technical capability required to be able to try to reduce the SEO impact of changing domains, as well as to insure the security and credibility of an end client, which would likely be challenging for many small non-profit organizations, who may not have the expertise, and would as a result lose traffic, brand awareness and possibly donations from the change, that they may not be technically equipped or financially capable of overcoming.

I certify (or declare) under penalty of perjury under the laws of Ukraine that the foregoing is true and correct.

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Signature)

## Appendix 1:

### Start the site move

Once the URL mapping is accurate and the redirects work, you're ready to move.

1. **Decide how you will move your site** — all at once, or in sections:

- **Small or medium sites:** We recommend moving all URLs on your site simultaneously instead of moving one section at a time. This helps users interact with the site better in its new form, and helps our algorithms detect the site move and update our index faster.
- **Large sites:** You can choose to move larger sites one section at a time. This can make it easier to monitor, detect, and fix problems faster.

2. **Update your robots.txt files:**

- **On the old site,** remove all `robots.txt` directives. This allows Googlebot to discover all redirects to the new site and update our index.
- **On the new site,** make sure the `robots.txt` file allows all crawling. This includes crawling of images, CSS, JavaScript, and other page assets, apart from the URLs you are certain you do not want crawled.

3. [Non-HTTP to HTTPS moves only] **Submit a [Change of Address](#) in Search Console for the old site.** Don't submit a change of address if you are only moving your site from HTTP to HTTPS.

4. Configure the old website to **redirect users and Googlebot to the new site** based on the URL mapping.

5. On the old site, **submit the two sitemaps you prepared previously** containing the old and new URLs. This helps our crawlers discover the redirects from the old URLs to the new URLs, and facilitates the site move.

6. **Keep the redirects for as long as possible,** and consider keeping them indefinitely. However, redirects are slow for users, so try to update your own links and any high-volume links from other websites to point to the new URLs.

Source: [https://developers.google.com/search/docs/advanced/crawling/site-move-with-url-changes?visit\\_id=637429373471155404-2463881620&rd=1#start-site-move](https://developers.google.com/search/docs/advanced/crawling/site-move-with-url-changes?visit_id=637429373471155404-2463881620&rd=1#start-site-move)