

Mr. Rod Beckstrom
President and CEO, ICANN
4676 Admiralty Way, Suite 330
Marina del Ray, CA 90292

Copenhagen 21. November 2009

Dear Chief Executive Officer Rod Beckstrom,

The Danish Internet Forum (DIFO) wishes to thank ICANN for the opportunity to comment on the Draft Applicant Guidebook, V3 (DAG3). DIFO is responsible for the Danish top-level domain, .dk. Its core business is the registration of domain names and the administration and technical operation of the national domain name registry in Denmark.

DIFO acknowledges the great amount of work, that has been done in order to examine the possibilities to establish new gTLD and IDN ccTLD. DIFO has the following comments to DAG3:

New gTLD in general

Last month, DIFO arranged a public meeting in Denmark to discuss the new gTLD proposal. None of the Danish companies represented at the meeting were interested in registering new gTLDs. They were satisfied with their possibilities to use .com and the relevant ccTLDs. On the contrary the companies were worried about their brands being exposed to abuse to an ever greater extent than today. Whereas Danish multinational enterprises might have power to fight abuse and IP infringements which are likely to occur, if the number of TLDs is growing, small and medium size enterprises do not. The companies feel that even though they find no use of a brand TLD, they have to try to protect their brand by registering them as a TLD in order to prevent other companies to do so. DIFO finds this situation very problematic.

The internet has been characterized by a well-arranged structure that is easy to use, because the numbers of TLD were limited. With an extension in the numbers of TLD, this is in danger. The many daily users will be affected by this, and in the end companies will lose their incentive to use the internet, if they are difficult to locate on the internet.

Geographical TLDs

DIFO finds that it is of outmost importance, that names of countries, territories and cities are not allowed as gTLD but should be registered as ccTLDs. If a .country can become a gTLD, e.g. .denmark will have completely different rules from the conditions of .dk. This will harm the users, who will expect .denmark to be governed by the same conditions as .dk, because gTLD have different privacy policies, language requirements for the registrars, dispute resolution etc.

If you have any questions or wish to discuss any of points raised herein, please contact DIFO's CEO Lise Fuhr (lise.fuhr@difo.dk).

On the behalf of the board of Danish Internet Forum
Yours sincerely,



Lise Fuhr
CEO
Danish Internet Forum