

The International AntiCounterfeiting Coalition (IACC) welcomes this opportunity to comment on the Fourth Draft Applicant Guidebook (DAG v.4), although given how little attention appears to have been paid to past comments, the IACC is forced to question the seriousness with which ICANN takes the entire public comment process.

In particular, through various comment periods, as well as dedicated processes dedicated to the development of meaningful rights protection mechanisms, the IACC has joined with countless other individuals and to underscore issues with and deficiencies in those mechanisms published by ICANN as part of these processes.

Regrettably, ICANN appears more interested a rapid rollout of new gTLDs than it is in insuring the development of adequate rights protection mechanisms.

As noted in public comments filed by the IACC (and other interested participants in ICANN processes), the Uniform Rapid Suspension program is anything but rapid and promises few, if any, economies over existing dispute resolution polices. The proposed Trademark Clearinghouse applies so narrowly as to be almost ineffective in providing protection for trademark owners against abuse of their trademarks.

The IACC accordingly refers to and incorporates its previous comments concerning various deficiencies with the proposed rights protection mechanisms and posted February 15, 2010, specifically:

IACC Comments on proposed Post-Delegation Dispute Resolution Policy at

<http://forum.icann.org/lists/ppdrp-15feb10/pdfwKb0aX2eSH.pdf>

IACC Comments on proposed Uniform Rapid Suspension policy at:

<http://forum.icann.org/lists/urs-15feb10/pdfH1cOkSWp0P.pdf>

IACC Comments on proposed Trademark Clearinghouse at:

<http://forum.icann.org/lists/tm-clear-15feb10/pdfMHkV5wfiX6.pdf>

If ICANN is to demonstrate its commitment to an efficient and transparent management of the domain name space, it must begin by developing processes which adequately protect the interests of all participants in the Internet community.