

July 21, 2010

VIA EMAIL (4gtld-guide@icann.org)

Mr. Rod Beckstrom, President and CEO and
Mr. Peter Dengate Thrush, Chairman of the Board of Directors
Internet Corporation for Assigned Names and Numbers (ICANN)
4676 Admiralty Way, Suite 330
Marina Del Ray, California 90292

**Re: Request for Comments on 4th Draft of
the New gTLD Draft Applicant Guidebook**

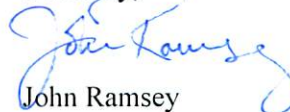
Dear Messrs. Beksrom and Dengate Thrush:

Rosetta Stone Ltd. ("Rosetta Stone") appreciates the opportunity to submit its comments on the fourth version of the Draft Applicant Guidebook ("DAG-V4"). Rosetta Stone remains strongly opposed to the proposed expansion of new Generic Top-Level Domains ("gTLDs"), particularly under currently anticipated timelines and procedures. As many others have commented previously, Rosetta Stone believes that an undertaking that could so drastically reorganize the existing online marketplace requires far greater transparency, justification, and independent analysis of the costs and benefits to all stakeholders, including the IP, trademark and business communities, and of the overall impact on global commerce, than have been presented to date.

Rosetta Stone shares the concerns raised by Verizon Communications Inc., in its letter dated July 20, 2010, filed in response to this inquiry. Rosetta Stone agrees with Verizon's analysis of the inadequacies and deficiencies of ICANN's Uniform Rapid Suspension Mechanism ("URS"), Trademark Clearinghouse, and Post-Delegation Dispute Resolution Procedure ("PDDRP") and Registry Restrictions Dispute Resolution Procedure ("RRDRP") proposals to provide any meaningful recourse or process by which rights-holders can protect and adjudicate their rights. Each of the proposed processes are so diluted, indefinite, administratively burdensome, and set such high standards of proof for the trademark holder, as to offer no meaningful protection or recourse to enable trademark owner to establish and defend its rights.

Rosetta Stone looks forward to further revisions to the DAG in which the clear deficiencies in each of these proposals are corrected, and meaningful and effective trademark enforcement and dispute resolution procedures are presented for consideration.

Sincerely,



John Ramsey
Corporate Counsel
Rosetta Stone

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