

**Reply Comments of the INTA Internet Committee  
on the Revised Proposal of the ACDR  
to Serve as a UDRP Dispute Resolution Service Provider  
April 12, 2013**

**Introduction**

The Internet Committee of the International Trademark Association (“INTA”) is pleased to provide reply comments on the Arab Center for Domain Name Dispute Resolution (ACDR) Revised Proposal to Serve as a UDRP Provider.

**Recommendation**

We support the comments of the GNSO Intellectual Property Constituency (IPC). The ACDR has adequately revised its Original Proposal, subject to clarification of its Supplemental Rule 3. The ACDR should be approved by ICANN to serve as a new UDRP provider. Not only will the ACDR add further geographic and cultural diversity to domain name dispute resolution, it will create a forum that can more readily address the needs of a significant population and provide support for the anticipated delegation of Arabic Internationalized Domain Names (IDNs).

The Revised Proposal demonstrates that the ACDR understands the requirements of serving as a UDRP provider and the importance of uniformity in these proceedings. As noted in the IPC comment, Supplemental Rules 3 and 4(c) of the Revised ACDR Proposal are inconsistent with UDRP Rules 3(b) and 5(b). As written, supplemental rules 3 and 4(c) suggest that a Complaint and Response can be transmitted via fax or postal mail; conversely, UDRP Rules 3(b) and 5(b) explicitly require that Complaints and Responses are transmitted electronically. We recommend that ACDR amend its Supplemental Rule 3 to mirror UDRP Rule 2(f). Supplemental Rule 4(c) requires no change if Supplemental Rule 3 is amended to apply only to communications and not filings or transmissions of documents such as Complaints and Responses.

Thank you for your consideration of our views on these important issues. Should you have any questions regarding our submission, please contact INTA External Relations Manager, Claudio Di Gangi at [cdigangi@inta.org](mailto:cdigangi@inta.org)

## **About the INTA Internet Committee**

The International Trademark Association (INTA) is a more than 134-year-old global organization with members in over 190 countries. One of INTA's key goals is the promotion and protection of trademarks as a primary means for consumers to make informed choices regarding the products and services they purchase. During the last decade, INTA has served as a leading voice for trademark owners in the development of cyberspace.

INTA's Internet Committee is a group of nearly two hundred trademark owners and professionals from around the world charged with evaluating treaties, laws, regulations and procedures relating to domain name assignment, use of trademarks on the Internet, and unfair competition on the Internet, and to develop and advocate policies to advance the balanced protection of trademarks on the Internet.