



Property Casualty Insurers

Association of America

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DAVID M. GOLDEN
SENIOR DIRECTOR, COMMERCIAL LINES

February 25, 2013

Karen Lentz
Internet Corporation for Assigned Names and Numbers
via E-mail

Re: PCI Comment On "Closed Generic" gTLD Applications

Dear Ms. Lentz:

The Property Casualty Insurers Association of America (PCI) is the largest home, auto and business insurer trade association in the United States. Our more than 1000 member insurers write nearly 40 percent of property-casualty premium in the U.S. PCI's mission is to promote and protect the viability of a competitive private insurance market for the benefit of consumers and insurers.

Exceptional security is critical for consumers to trust their insurance transactions to the Internet. Cyber criminals know that a great deal of private financial information flows through insurance transactions. This is also true for many other industries. ICANN's own Governmental Advisory Committee wrote in its February 28, 2011, report card that, "Those strings that refer to particular sectors, such as those subject to national regulation (such as .bank, .pharmacy) or those that describe or are targeted to a population or industry that is vulnerable to online fraud or abuse, should also be considered 'community-based' strings."

At its February 2, 2013, meeting, the ICANN Board of Directors recognized the problems presented by applications that would restrict use of generic industry terms to a single company. Granting monopoly control of a TLD to a single industry member can create an unfair competitive advantage. Such an arrangement would work against both consumers and the industry associated with the generic term.

At the same time, PCI cautions ICANN against promulgating rules that prevent community-based generic TLDs that are restricted to use only by qualified businesses within that generic term's industry. Such a TLD can enhance online safety and security for consumers, as well as the TLD's credibility to represent the industry involved.

For example, control of hypothetical .WIDGET by the ABC Wiget Company for its sole use would create an unfair competitive advantage. On the other hand, community-based control of .WIDGET by a widget manufacturers association, and open to any qualified widget industry company, would be appropriate. It would provide an opportunity to improve the safety and credibility of the .WIDGET TLD for consumers and the widget industry.

ICANN states on its Web site that "its mission [is] to ensure a stable and unified global Internet. One of its key responsibilities is introducing and promoting competition in the registration of domain names, while ensuring the security and stability of the domain name system." A community-based approach supports that mission.

PCI commends ICANN for seeing the need to address "closed generic" TLD applications and hopes that ICANN will adopt requirements for generic TLDs that will enhance, rather than restrict, qualified competition in the Internet marketplace.

Sincerely,

David M. Golden

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