

INTA Internet Committee Comment on the Request for Release of Country and Territory Names within the .NEUSTAR TLD

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The International Trademark Association (INTA) welcomes this opportunity to provide public comment in relation to the above matter, which has arisen out of NeuStar, Inc's request to release country names at the second level within its closed, .BRAND registry, .NEUSTAR.

Specifically, NeuStar, Inc has requested an amendment to the .NEUSTAR Registry Agreement to allow the release of the country and territory names currently reserved by Section 4 of Specification 5 of that Agreement. This section provides that Registry Operators must reserve the country and territory names, but may propose their release subject to review by the Governmental Advisory Committee and approval by ICANN.

In our view, there is no persuasive reason for restricting the release and activation of country and territory names as second level domains by closed, .BRAND registries such as .NEUSTAR, or requiring closed, .BRAND registries to submit to a cumbersome, unpredictable, and potentially unevenly applied procedure in order to obtain the release and right to activate them. On the contrary, we bring to your attention the following potential benefits of releasing these names for their immediate activation by NeuStar and any closed, .BRAND registry operator:

- Improved user navigation of the Internet through short, meaningful and memorable domain names that most directly signal geo-targeted website content.
- Promotion of country and language-specific webpages with online services targeted accordingly, thus encouraging closed brand TLD operators to create customized and relevant localized content for consumers which stands to provide significant consumer benefits, especially in developing nations with predominantly non-English-speaking populations.
- Enhanced consumer awareness of the difference between national and international websites and services.
- Enhanced online security by giving organizations and businesses greater control over their country-customised websites and online services (thereby cultivating trust in online commerce, particularly in developing nations). Certain ccTLDs have raised security concerns due to registry security breaches while others are widely used for the registration of unauthorized websites, leading to consumer confusion.

In addition:

- There should be no risk of confusion as to whether a .BRAND registry operator's use of a particular second level country or territory name within a closed, .BRAND TLD is associated with the government of that particular country. As the country code will be necessarily linked to a .BRAND top level domain, consumers will instantly be

aware that a COUNTRY.BRAND domain name will be a privately operated domain which is being targeted to a particular geographic region.

- By their very nature, descriptive country and territory names are not 'proprietary' in nature and should be freely available by brands to indicate a valid geographic connection.

About INTA and the Internet Committee

INTA is a 136 year-old global not for profit association with more than 6,400 member organizations from over 190 countries. One of INTA's 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 also been the leading voice of trademark owners within the Internet community, serving as a founding member of the Intellectual Property Constituency of the Internet Corporation for Assigned Names and Numbers (ICANN).

INTA's Internet Committee is a group of over 200 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, whose mission is to advance the balanced protection of trademarks on the Internet.