

Dr. Stephen D. Crocker, Chairman of the Board
Mr. Fadi Chehadé, President & CEO
Mr. Cherine Chalaby, Chair of the New gTLD Committee
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

By email: comments-gac-safeguard-advice-23apr13@icann.org

29 May 2013

Dear Sirs

Re: Closed Generic Top-Level Domains (gTLDs) and GAC Safeguard Advice

On behalf of The UK Publishers Association¹ ('The PA') I am writing in support of the 'Safeguards on New gTLDs' proposed by ICANN's Governmental Accountability Committee (GAC). The PA urges ICANN to support and implement these Safeguards at the earliest opportunity.

The PA, along with many organisations, has deep concerns about the potential for single private companies to secure the exclusive use of a gTLD that has vast potential application and scope (for example, ".book") which will likely stifle rather than promote competition in the provision of registry services. (The prospect of this outcome is clearly present in Amazon's application for the ".book" domain, in which it stated that it would be "*a single entity registry, with all domains registered to Amazon for use in pursuit of Amazon's business goals. There will be no re-sellers in .BOOK and there will be no market in .BOOK domains. Amazon will strictly control the use of .BOOK domains.*")

To mitigate against this, and to ensure the smooth running of the new gTLD programme, we urge the adoption of GAC's List of "Safeguards Applicable to all New gTLDs" which we believe will enhance transparency, expand competition and cement consumer choice, and in turn will significantly reduce the risk of abusive registrations in all gTLDs.

In particular, we support the introduction of specific safeguards, such as binding registrants to avoid abusive uses (particularly with regards to unfair competition) of the domain names they register and providing complaint channels to flag abuses. These measures, alongside imposing appropriate consequences when violations do occur, are common sense procedures that we would expect to see responsible registry operators support and implement, and which will engender stakeholder trust in this process.

¹ The Publishers Association is the trade body representing book, journal, audio and electronic publishers in the UK. Our 115 members span the trade, education and academic publishing sectors and represent 80% of the publishing market in the UK.

THE PUBLISHERS ASSOCIATION

Safeguards are especially vital for TLDs at higher risk of abuse and should be mandatory for those listed by GAC as “sensitive strings.” The PA shares GAC’s view that further safeguards may be needed in such cases. Further, we remain of the view that strings such as “.book”, of significant interest to our members, must be considered a generic term, with registry access serving a public interest goal, rather than a commercial one.

We strongly believe that this is a process must be got right from the outset to avoid unintended negative consequences and it is vital that ICANN work with the GAC to integrate key elements of the Advice into the remaining stages of the new gTLD process.

If you would like any further information or view as to The PA’s approach on this question please do drop me a line.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Mollet', enclosed in a thin black rectangular border.

Richard Mollet
Chief Executive
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