



Property Casualty Insurers

Association of America

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SENIOR DIRECTOR, COMMERCIAL LINES

May 14, 2013

Jamie Hedlund
Internet Corporation for Assigned Names and Numbers
via E-mail

Re: PCI Comment On GAC Advice and Communique of April 11, 2013

Dear Mr. Hedlund:

This letter expresses the support of the Property Casualty Insurers Association of America (PCI) for the Generic Top Level Domain (gTLD) safeguards recommended by ICANN's Governmental Advisory Committee (GAC) in its April 11, 2013, communique.

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.

In its communique, the GAC reinforced PCI's own previous comments regarding community support for applications. While we continue our position that generic industry terms, such as ".INSURANCE" should not become gTLDs, we recognize that ICANN has determined to move forward with generic terms as TLDs. As the representative of over 1,000 insurance community members, we strongly agree with the GAC, and ICANN's own Applicant Guidebook, that community-based applications are preferable to applications from outside the community. We remind ICANN that such a community-based application for ".INSURANCE" exists from fTLD Services.

Likewise, "The GAC believes that singular and plural versions of [a] string as a TLD could lead to potential consumer confusion." Several confusingly similar string applications exist regarding ".INSURANCE." For consumers, ".AUTOINSURANCE," ".CARINSURANCE," and especially ".INSURE" are so close to ".INSURANCE" that they would likely cause dangerous confusion. Since none of these TLDs is community-based, and since they are confusingly similar to ".INSURANCE," we believe that the GAC advice should lead ICANN to reject all three applications in favor of the community-based application for ".INSURANCE."

Exceptional security and other consumer protections are 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.

The GAC specifically identified the ".AUTO INSURANCE," ".CARINSURANCE," and ".INSURE" TLDs as requiring additional safeguards for government-regulated financial sector entities. The GAC correctly stated, "These strings are likely to invoke a level of implied trust from consumers, and carry higher levels of risk associated with consumer harm." The safeguards identified by the GAC should be the bare minimum for acceptability. Enhanced safeguards, such as those included by fTLD Services in its community-based application for ".INSURANCE" should be considered for application to other market sectors included in the GAC's advice.

The GAC communique advocates an important concept for strings that are tied to regulated or professional sectors, such as insurance: the concept of restricted access. The GAC rightly states, "In these cases, the

registration restrictions should be appropriate for the types of risks associated with the TLD.” Highly regulated financial services, such as insurance and banking, certainly fit this description.

On the other hand, the GAC also correctly states that *exclusive* registry access for generic-term TLDs should “serve a public purpose.” The GAC identifies “.AUTOINSURANCE” and “.CARINSURANCE” in this category, and we agree. Not only are these two terms confusingly similar to “.INSURANCE,” their applications are for exclusive access by a single company, without any apparent public purpose.

PCI commends ICANN for seeing the need to address the GAC’s advice to the ICANN Board, as described in its communique of April 11, 2013. We hope that ICANN will adopt requirements for generic-term TLDs that will enhance the safety of conducting financial transactions in the Internet marketplace. Enhancing safety for Internet consumers should also include enhanced trademark protections for second-level domain registrations, and we call your attention to our previous comments on that subject.

Sincerely,

David M. Golden

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