

Dear Sirs,

Date 28 May 2013

We, along with many other creative sector organisations, including the Coalition for Online Accountability (**COA**), are submitting these comments as we wish to urge ICANN to accept the key elements of the New gTLD Safeguard Advice (the “**Advice**” or “**Safeguards**”) from ICANN’s Governmental Accountability Committee (**GAC**).

Musiikkituottajat - IFPI Finland ry is a national trade association representing 23 record companies in Finland and constitutes the Finnish national group of the International Federation of the Phonographic Industry (IFPI). Our members hold approximately a 95 per cent market share of the total music market in Finland and our mission is to ensure they have a favourable operational environment in Finland.

We believe that ICANN should welcome the detailed Advice from GAC and incorporate its key elements into the new gTLD program as this would increase the likelihood of the program achieving its stated goals to expand competition and enhance consumer choice. We encourage ICANN to work with GAC to clarify any ambiguities in the Advice and also further with applicants and the community to ensure that key elements of the Advice are integrated into the remaining stages of the new gTLD process.

We also commend GAC’s list of Safeguards Applicable to all New gTLDs due to the fact that these Safeguards would significantly reduce the risk of abusive registrations in all gTLDs. Identifying the registrants, ensuring that the registrants only use the domain names they register for licensed and legitimate activities, and providing sufficient channels for complaints of any abuses of domain names, are factors of great importance to us.

These Safeguards are neither unprecedented nor unanticipated. There are similar features, such as requirements to verify Whois data and to enforce terms of use against illegal activity by registrants that infringe the rights of others, in the revised Registrar Accreditation Agreement.

Safeguards are vital for gTLDs that stand a higher risk of abuse that would harm consumers or the rights of others. Such gTLDs particularly include applications targeted at sectors dependent on copyright protection, since these are consistently experiencing high levels of online infringement. Meaningful steps used to anticipate and manage risks of abuse of such gTLDs should be mandatory and therefore, even if not required for all new gTLDs, GAC’s six basic Safeguards should be mandated for those listed as “sensitive strings” within the GAC Advice.

We ask that ICANN takes our comments into consideration and incorporates the key elements of the Advice into the new gTLD program, thus promoting a secure and legitimate online environment.

Yours faithfully,

Musiikkituottajat – IFPI Finland ry

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