



May 13, 2013

Dr. Steven Crocker
Chairman of the Board of Directors
Ms. Heather Dryden
Chairman of the Governmental Advisory Committee
Internet Corporation for Assigned Names and Numbers
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comments-gac-safeguard-advice-23apr13@icann.org

NATIONAL
ASSOCIATION
OF
REAL ESTATE
INVESTMENT
TRUSTS®

Re: National Association of Real Estate Investment Trusts, Inc. Response to GAC Safeguard Advice [Application ID 1-1760-71167]

Dear Dr. Crocker and Ms. Dryden:



REITs:
BUILDING
DIVIDENDS
AND
DIVERSIFICATION®

The National Association of Real Estate Investment Trusts, Inc. (“NAREIT”) writes to address the Governmental Advisory Committee (“GAC”) safeguard advice issued on April 11, 2013 with respect to the .REIT new gTLD string. Specifically, the .REIT new gTLD string was identified by the GAC as being linked to the financial sector and “likely to invoke a level of implied trust from consumers, and carry higher levels of risk associated with consumer harm.” Thus, it “should operate in a way that is consistent with applicable laws.”

We are grateful to receive this important input from the GAC and we fully appreciate that safeguard advice relates to new gTLD strings themselves rather than to the content of any individual new gTLD application. Thus, while we feel that several aspects of the safeguard advice require greater clarity and guidance (including implementation and enforcement of these safeguards in particular, as well as the necessity and applicability of Public Interest Specifications) we also fully agree with the GAC that the .REIT new gTLD string must be protected—this has always been our singular goal in applying to operate it.

Indeed, the content of our application for the .REIT new gTLD string already addresses nearly all applicable safeguards, including safeguards prescribed for all new gTLDs, as well as the safeguards for consumer protection, sensitive strings, and regulated markets. Perhaps the best examples are contained in our response to Question 20, which endorses NAREIT as a trusted representative for the worldwide REIT community and also outlines stringent registration policies to verify and validate genuine members of the REIT community pursuant to clear and regulated entry requirements. In addition, our responses to Questions 26, 28



and 29 squarely address WHOIS verification and registration abuse prohibition, study and reporting mechanisms already in line with the safeguards prescribed by the GAC.

Accordingly, we encourage both the GAC and the ICANN Board of Directors to review our application in light of this safeguard advice. We also pledge to work with the GAC and relevant regulatory bodies to assuage any safeguard concerns that are not already addressed in our application.

Sincerely,



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