

Dear Sirs

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 key elements of the New gTLD Safeguard Advice (the "Advice") from ICANN's Governmental Accountability Committee (GAC).

The "Verband der österreichischen Musikwirtschaft - IFPI Austria" represents Austrian independent music companies as well as local affiliates of international entertainment companies. Our goal is the encouragement of the economic, legal and cultural framework, which allows our members to deliver their music productions to the widest possible audience. We are promoting the value of recorded music, safeguarding the rights of record producers, fighting against music piracy and expand the commercial uses of recorded music.

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

Further, we commend the GAC's list of Safeguards Applicable to all New gTLDs as these safeguards could significantly reduce the risk of abusive registrations in all gTLDs. Knowing who the registrants are, binding them to avoid abusive uses of domain names they register and providing complaint channels to highlight abuses are factors of great importance to us.

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

Safeguards are imperative for gTLDs at higher risk of abuse that harms consumers or the rights of others. This notably includes applications targeted at sectors dependent on copyright protection, which have consistently experienced high levels of online infringement, meaningful steps to anticipate and manage these risks should be mandatory. Therefore, even if not required for all new gTLDs, the GAC's six basic safeguards should be mandated for those listed as "sensitive strings" within the GAC advice.

Yours faithfully




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