

**VIRTUALAW LLC**

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**April 14, 2014**

**By E-Mail**

Internet Corporation for Assigned Names and Numbers  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

**Re: Preliminary Issue Report on Access by IGOs and INGOs to the Curative Rights Protections of the UDRP and URS**

Dear ICANN:

I am writing on behalf of the members of the Internet Commerce Association (ICA). ICA is a not-for-profit trade association representing the domain name industry, including domain registrants, domain marketplaces, and direct search providers. Its membership is composed of domain name registrants who invest in domain names (DNs) and develop the associated websites, as well as the companies that serve them. Professional domain name registrants are a major source of the fees that support registrars, registries, and ICANN itself. ICA members own and operate approximately ten percent of all existing Internet domains on behalf of their own domain portfolios as well as those of thousands of customers.

This letter addresses the Preliminary Issue Report on Access by IGOs and INGOs to the Curative Rights Protections of the UDRP and URS published for public comment on March 10, 2014<sup>1</sup>.

