



31 March 2014

**Re: Mitigating the Risk of DNS Namespace Collisions**

We appreciate that ICANN continues to take security and stability issues seriously, in particular as these themes underpin global online trade, and we thank you for the opportunity to comment on the “Mitigating the Risk of DNS Namespace Collisions” report.

We are pleased that the JAS report maps out a process for Registry Operators to “unblock” the terms on their Second-level Domain (SLD) Block Lists, but, for registries which have already launched, the progression from the “alternate path to delegation” to the release of terms on the SLD Block Lists leaves a potential loophole meaning that the released names may not be subject to the standard Sunrise and Trademark Claims requirements. Therefore, in the event already-launched TLDs release names for registration from their SLD Block Lists, we suggest these names should be subject to Sunrise and Trademark Claims.

Upon looking at the SLD Block Lists for .brand applicants it becomes clear that many of the terms are trademarks for the brand’s products and services, seemingly generated at the root by the brand itself. It is counterintuitive for a brand to be barred from using names corresponding to its trademarks, for which it was the cause of the root server query, so we would also suggest that ICANN consider an alternative process for .brand applicants to expedite the release of such trademarked terms for their immediate use.

Thank you for considering these comments.

Yours sincerely,

/s/

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