



**American Insurance Association**

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VIA Electronic Mail: [comments-pab-new-gtld-strings-21mar14@icann.org](mailto:comments-pab-new-gtld-strings-21mar14@icann.org)

Internet Corporation for Assigned Names and Numbers  
c/o Heidi Ullrich, Senior Director At Large  
12025 Waterfront Drive  
Suite 300  
Los Angeles, California 90094-2536

RE: Mandatory Policy Advisory Boards for Regulated Industry Sector and Consumer-Trust-Sensitive New gTLD Strings

Dear Ms. Ullrich:

I write on behalf of the American Insurance Association (AIA) to provide comments addressing the proposal for the Use of Mandatory Policy Advisory Boards for Regulated Industry Sector and Consumer-Trust-Sensitive New gTLD Strings (the "Mandatory PAB"). AIA is the leading property-casualty insurance trade organization, representing approximately 300 insurers that write nearly \$100 billion in premiums each year. Our members offer a variety of property-casualty insurance, including personal and commercial auto insurance, commercial property and liability coverage for businesses, homeowners' insurance, workers compensation, product liability insurance, and medical malpractice coverage.

AIA has previously expressed significant concern with the New gTLD Program Committee's (NGPC) proposal to implement the Government Advisory Committee's (GAC) Beijing Communiqué Advice concerning Category 1 Safeguards (Beijing Communiqué). The NGPC implementation plans substantively alter the GAC Safeguards including dividing Category 1 strings between "Regulated Sectors" and "Highly Regulated Sectors" with "Regulated Sector" terms being subject to a significantly reduced number of Safeguards. Of particular concern to AIA is the inclusion of .insure in the "Regulated Sector." We also note that the GAC recently reiterated its concerns to ICANN that the NGPC's proposed implementation of the GAC Safeguards will cause "greater risks of fraud and deception ... as a result of failing to implement the GAC's" Advice (Singapore Communiqué).

Adequate contractual oversight of a domain name registry is essential to ensuring that serious consumer abuse does not occur and that consumer confidence and trust in the industry remain high. Therefore we support the concept of a policy advisory board, because without it there are limited, if any, controls in place to address the concerns that the GAC has identified in the Beijing Communiqué and reiterated in the Singapore Communiqué. However, we would recommend further consideration by the ICANN in developing the specific parameters for such advisory boards.

Thank you for your consideration of these comments. AIA appreciates the opportunity and is available to answer any questions.

Respectfully,

A handwritten signature in black ink, reading "Angela Gleason". The signature is written in a cursive, flowing style.

Angela Gleason  
Associate Counsel