



*Working to Protect Access to Safe & Affordable Medicine*

To: ICANN Board of Directors and Governmental Advisory Committee

As Americans who recognize the public health importance of personal drug importation from safe online sources, we urge you to reject the application of the National Association of Boards of Pharmacy (NABP) for the .pharmacy generic top-level domain (gTLD).

Due to the applicant's history of actions and positions, we have little doubt that, if approved, NABP will prevent safe, regulated and licensed Canadian and other international online pharmacies from registering domains in the .pharmacy gTLD. Such an action would block trusted distance care providers from utilizing the gTLD that global consumers will come to regard as a mark of authenticity for safe medication.

Large pharmaceutical companies and NABP-member U.S. pharmacies oppose personal importation because Americans can obtain identical, legitimate, but lower cost prescription medications through licensed online pharmacies domiciled outside the U.S. This opposition is significant in light of the fact that U.S. pharmaceutical companies have largely funded NABP's application for .pharmacy. Further, NABP uses funding from pharmaceutical companies and U.S. pharmacies for its programs and activities. We believe that it is an inherent conflict of interest. Through its .pharmacy application, NABP seeks to control access to affordable medication not just for Americans but for all global consumers with an Internet connection.

Large pharmaceutical firms seek to keep drug prices high for as long as possible through a combination of dubious and aggressive tactics, including regional differential pricing arrangements and payments to prevent the availability of lower cost generics. Their backing of the .pharmacy application seeks to extend these inflated pricing measures to the Internet retail sector.

The .pharmacy gTLD must be operated in a manner that ensures that this unique global Internet resource provides benefits to all consumers seeking access to safe and affordable medicines no matter where they reside. ICANN must act in the global public interest by ensuring that NABP cannot endanger hundreds of thousands of lives through control of .pharmacy. A fully inclusive advisory board that includes legitimate online pharmacies and consumer groups from around the world should set the registration policies for .pharmacy.

The problem of drug affordability is a global issue. Within the U.S., unique among wealthy nations, it is dire—the Commonwealth Fund reports that 50 million Americans chose not to fill a prescription last year because of high U.S. costs. If NABP's .pharmacy application is approved, access to affordable medicine will be further restricted through the denial of domain registrations to licensed and regulated providers of lower cost prescription drugs, compounding this public health crisis. Please don't let that happen.

We, the undersigned, oppose the NABP's .pharmacy gTLD application and respectfully request your consideration of this petition.