

VIRTUALAW LLC

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By E-Mail

Internet Corporation for Assigned Names and Numbers

12025 Waterfront Drive, Suite 300

Los Angeles, CA 90094-2536

Re: Policy vs. Implementation

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.

These comments reflect our views on the Policy vs. Implementation issue that was posted for public comment on January 31, 2013 at <http://www.icann.org/en/news/public-comment/policy-implementation-31jan13-en.htm>. The ICANN community and the global public have been asked to react to an ICANN staff paper "outlining a draft framework for community discussion that identifies a number of steps and criteria that might facilitate dealing with questions relating to policy vs. implementation in the future".

