

.london comments on Rights Protection Mechanism (RPM) Requirements

Dear Sirs,

27th August

As applicant for the .london top-level domain we support the comments submitted by Minds + Machines our Registry Services Provider on 26th August 2013. The proposals set out in Minds + Machines' submission closely follow those set out in the letter of July 12 2013, submitted on behalf of the GeoTLD Group of which we are an active member.

Founders' Programme and allocation of important domain names to London

A Founders' Programme is crucial in promoting the new domain to London institutions, businesses and organisations as is the allocation of certain names and terms important to London. The proposed rules in the RPM requirements pose significant barriers to this. For a successful promotion of the .london top-level domain, we need to have the ability to allocate a range of names to our founders and delegate these ahead of the Trademark Sunrise.

We therefore wish to have flexibility in the number of names available to allocate to Founders and in the way these are allocated. If this is not possible, then we would support the more limited proposal for the ability to allocate and activate 100 names in advance of the Sunrise Period.

Prioritising London entities

We support the protection of intellectual property as a cornerstone of successful businesses. However, in order for London entities to benefit from the .london domain, we aim to prioritise London businesses/stakeholders/organisations and individuals during the launch phases of the .london top-level domain. This includes being able to prioritise entities with a physical London address during the Trademark Sunrise period. After launch phases we plan for non-London entities to have the opportunity of buying .london domain names. We seek the flexibility therefore to have a 'London' requirement in Sunrise even though it will not be a criteria during general availability.

In addition, we do not believe that the obligation on local businesses to register their trademark in ICANN's Trademark Clearing House with its associated cost to be an ideal solution for businesses who would only be interested in a single domain. We therefore support the ability to introduce a local cost-efficient trademark validation system that could be offered instead of the TMCH which would allow London businesses with trademark rights to participate in the .london Sunrise.

Exemption procedure

We would prefer to have these changes reflected in the core RPM requirements. However, should this not be possible we would support the proposal to introduce an exemption procedure.

Yours sincerely,

Julie Chappell

Direct of Digital & Consumer Channels
London & Partners