



bbc.co.uk

07 January 2014

Re: Proposal for a Specification 13 to the ICANN Registry Agreement to Contractually Reflect Certain Limited Aspects of ".Brand" New gTLDs

We write in support of the principle that certain TLDs be classified as 'dot.brands'. When many years ago the ICANN community initially contemplated the opening up of the domain name space in the way that is now happening, the dominant (perhaps only) model contemplated was that of domain name retail sales at the second level. In the event, around a third of applicants for new gTLDs are not domain name retailers, but are organisations seeking to register their own brand as a top level domain (the BBC is one such organisation, and has applied for dot.bbc).

The intention of such brand applicants is to offer to their customers, audiences and others, trusted online spaces in which to do business and, in the case of the BBC, enjoy and interact with genuine, creative, impartial content, secure in the knowledge that it comes from the BBC. In doing so, these brand applicants offer real innovation in the online space.

Unlike in traditional open "generic" gTLDs focused on registration volume and added services - and with no accountability as to/for third party actors - under a .Brand there is one entity responsible and accountable for conduct in the space. Therefore the issues and risks inherent in running a top level domain are more limited for .brand registries.

It follows that we also therefore support the proposed "Specification 13" that the newly formed Brand Registry Group (of which the BBC is a member) has requested ICANN include in its registry agreements with brand applicants. The purpose of the proposed Specification 13 is to provide contract terms more fit for purpose for those applicants for top level domains where the domain is their brand, and where the domain will be used for their own and their licensees' business purposes and not offered for retail sale. The proposed Specification 13 more closely reflects some of the unique characteristics of .Brand registries.

Zillah Watson, BBC R&D