



December 30, 2013
Internet Corporation of Assigned Names and Numbers (ICANN)
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Los Angeles, California
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Dear ICANN Staff, Please accept these comments from SLAM Strategy with regards to the public comment for Specification 13 proposal, dated December 30th.

Our comments relate specifically to:

- 1. Whether it is appropriate to classify certain TLDs as “.Brand TLDs”;*
- 2. Whether the definition of “.Brand TLD” is sufficiently narrow to capture only what is commonly recognized as a corporate brand;*
- 3. Whether there may be unintended consequences associated with the implementation of draft Specification 13.*

Whether it is appropriate to classify certain TLDs as “.Brand TLDs”

The creation of a .brand category with a specific definition allows room for business models that were unthinkable until now. To date the domain space has largely been used as more of an administrative tool and businesses have not been able to fully capitalise on their online presence. This new category will allow brands to continue to grow, mature and evolve in the domain space in a way that is more conducive to their specific commercial needs. Integrity and security are two of the main issues that brands have issues with on the Internet. The creation of a specific class of TLD's will help to manage this as the brands will have more control of their content. The result will be a less confusing space with improved integrity and security for consumers and brands, enabling customers to more easily identify, relate, integrate and develop with their favourite brands. As a result, this will help to secure the future of the entire domain industry and make it more relevant to the general public.

Innovation - Achieving one of ICANN's objectives

Brands are the innovators of innovation and classifying .Brands differently to other TLDs categories is the expression of what ICANN has always set out to achieve, with one of its objectives being the fostering of innovation. Due to the brand's relationship needs with their established customer base, brands have the ability to create innovation that the traditional TLDs could never do. Brands need to be able to continue to develop those relationships online to not only allow for future growth and relevance, but also to help develop the entire domain industry. However as important as those relationships are, it is also important that companies are able to maintain a high degree of control of over their namespace. Through improved integrity and security brands can achieve their corporate objectives and a .Brand TLD achieves just that.

The domain industry is a technology and as such needs innovation if it is to remain relevant and survive into the foreseeable future. Without this new class such innovations as the ability for brands to be able to offer Personalised Domain Names (PDNs) would be impossible. PDNs open the doors for brands to be able to connect with their customers in new and exciting ways while still maintaining control, therefore Internet abuse can stop promptly. This trust and integrity in the domain space is currently missing for brands. PDNs are the fastest and most effective way to educate the public about the value of the entire domain name industry due to the existing trusted relationships that brands have with their customers thus helping to secure its future. Therefore ICANN has the ability to implement positive social and commercial change through the delegation of .Brand TLDs.

The new specification will make it clear that it's possible for companies like ours to continue to develop specific .brand services that will be required to effectively manage PDNs for brands without fear that we will be against the Registry Agreement.





Whether the definition of “.Brand TLD” is sufficiently narrow to capture only what is commonly recognized as a corporate brand

Yes we believe that the definition is sufficiently narrow. The fundamental differences are that brands will not be selling their domains and they will be able to allow third parties to assist them with developing and innovating their space without the same restrictions requirements of the open TLD. As long as brands have the ability to commercialise their interests without negatively impacting on the greater domain industry the definition is significantly narrow.

Whether there may be unintended consequences associated with the implementation of draft Specification 13

Whenever money and power are involved there will always be those who will create unintended consequences. An unintended consequence could possibly be brands positioning themselves to block competitors of both similar products and services and similar or same brand names. ICANN needs to be careful to make sure that this process allows for all to compete in the space and not just those early adopters. This may mean allowing for confusingly similar TLDs. Since they are not selling domains this becomes somewhat less of an issue. .Brands represent the largest community of TLD operators and as such will (once delegated) wield (as a group) significant influence on the future of the internet as we know it. At times the interests of the brands are not always going to be aligned with the best interests of the public. However the brands do represent the interests of some of the public so recognising .Brand TLDs differently is vital. We would go as far to say that the brands and their customers will play a significantly important role in the future relevance and success of the entire domain industry. Although it's impossible to know exactly how brands will use their .Brands, we believe ICANN needs to allow significant room to foster innovation in conjunction with any third parties assisting the brands. At the same time ICANN still needs to retain the ability to override any decisions made if it is ever established that the outcomes are not in the best interests of the wider community. The multi stakeholder, bottom up principle needs to remain in place to ensure that public interest always outweighs commercial interest. If ICANN can create such an environment then we believe that any unintended consequences in the future can be overcome.

Correctly adding .Brand TLDs to the root level will have a dramatic effect on the Internet both publically and commercially. By creating the right environment for brands to be able to innovate in ways that are impossible under the current structure, ICANN will be helping to secure the future of the domain industries.

Warm Regards
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