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VIA EMAIL ONLY (eudrp@icann.org)

ICANN

**Re: Request for Public Comment - WIPO Proposal for Modification
of UDRP Rules to Allow "Paperless" UDRP Proceedings**

Verizon appreciates the opportunity to provide comments on the proposal from the World Intellectual Property Organization ("WIPO") regarding its suggested changes to the implementation rules to allow for a paperless UDRP proceeding ("eUDRP"). Verizon expends substantial effort and expense in protecting its valuable intellectual property rights under the UDRP and has filed numerous complaints with both WIPO and the National Arbitration Forum ("NAF").

In this digital age, a requirement of paper filing is burdensome, costly and inefficient. Accordingly, Verizon agrees with the reasons set forth by WIPO and NAF as to why ICANN should consider allowing a eUDRP. We believe that certain commentators may have misread WIPO's proposal by raising concerns that a eUDRP may result in erroneous default judgments. In fact, as outlined in WIPO's proposal, respondents will continue to receive written notice that a dispute has commenced.

Verizon has already filed paperless complaints with Nominet, a UDRP-like complaint procedure for .uk domain names, which has migrated its dispute resolution service to a paperless process. In light of ICANN's firm commitment to implement its new gTLD program which will potentially introduce an unlimited number of gTLDs into the domain name system, without having finalized what rights protection mechanisms will be offered to trademark owners, we expect to file additional UDRP complaints to protect against domain name abuse. A eUDRP would expedite our handling of such domain name abuses.

Finally, should a eUDRP come into existence with improved operational efficiencies and cost savings for WIPO and NAF, as well as other providers of a eUDRP, we would hope to see those savings passed on to users by reducing the current high costs associated with filing UDRP complaints.

ICANN
August 5, 2009
Page 2

We thank you once again for this opportunity to contribute these comments.

Very truly yours,

A handwritten signature in blue ink that reads "Sarah B. Deutsch" followed by a stylized flourish or date "10/17/1".

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