



BY E-MAIL (gtld-guide@icann.org)

ICANN

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December 12, 2008

Comments on the New gTLD Program and Process

Dear Sirs,

We refer to the current public consultation on the New gTLD Draft Applicant Guidebook.

economiesuisse is the largest umbrella organization representing the Swiss economy. Our federation has the support of more than 30,000 businesses of all sizes, employing a total of 1.5 million people in Switzerland.

Our members are seriously concerned about ICANN's new TLD program. On the one hand, it is doubtful whether there is a real demand for such new TLDs. On the other hand, a multitude of new TLDs increases the risk of trademark infringements and abuses such as cyber squatting, phishing, distribution of counterfeits and unfair competition. Therefore, we believe that the majority of applicants will either be corporations that have to apply for TLDs purely for defensive reasons or cyber squatters etc. This will lead to an excessive and unnecessary increase in costs. In particular, it puts small companies at a disadvantage. With ICANN's new TLD program, there is also a risk that consumer's confidence in the security of the Internet as an e-commerce tool will be harmed.

Therefore, we strongly plead for a cancellation or at least a delay of the TLD program until further research has been done into whether there is a sufficient demand for the program and whether there are appropriate tools in place to protect the interests of trade mark holders.

Yours sincerely,
economiesuisse

Thomas Pletscher
Member of the Executive Board

Urs Furrer
Deputy Head Competition and Regulation

cc: **Swiss Federal office of communications** (by E-Mail)
Dr Martin Dumermuth, Director, and Mr Francois Maurer, Head of section Numbering and addressing