



July 15, 2010

Donald D. Overton Jr., Executive Director
Veterans of Modern Warfare
8719 Colesville Rd, Suite 100
Silver Spring, MD 20910

Peter Dengate Thrush, Chairman
Members of the Board of Directors
International Corporation for Assigned Names and Numbers

Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

RE: Employ Media sTLD Charter Amendment

Dear Chairman Dengate Thrush and Members of the Board:

I am writing on behalf of Veterans of Modern Warfare (VMW - www.vmwusa.org), the newest national Veterans service organization, focused on mutual assistance to Veterans with military service from 1990 - the time of the Persian Gulf War that ushered in a new era of modern warfare - through the present, including the Wars in Iraq and Afghanistan. VMW urges you to reject Employ Media's request for authority to permit second level registration of strings that do not correspond to an employer's name in the .jobs (DOT JOBS) sponsored top level domain. Veterans nationwide would be directly and adversely affected in their search for jobs if this is allowed to occur. VMW opposes the unilateral expansion of the .jobs charter to encompass regional and industry-specific second-level registrations.

Under the terms of ICANN's request for proposals for new sTLDs dated 15 December 2003 (the "sTLD RFP"), applicants - including Employ Media - were required to demonstrate that the proposed sTLD addresses the needs and interests of a clearly defined community (the Sponsored TLD Community). In addition, applicants were required to demonstrate that the policy-formulation procedures for the sTLD operate primarily in the interests of the Sponsored

TLD Community, and that the proposed sTLD enjoys broad based support of the Sponsored TLD Community.¹

In its application, Employ Media proposed to serve the needs of human resources professionals responsible for human resources management in the corporate setting, and pledged to maintain .jobs as “a name space for employers.”² It also promised to limit registrations to the legal name of an employer and/or a name or abbreviation by which the employer is commonly known and to prohibit registration of occupational and industry, and geographic identifiers.”³ Employ Media’s current request to permit the “registration, use, and promotions of domains that are not the company names of the registrant”⁴ would fundamentally alter the Sponsored Community for the .jobs sTLD and eliminate its pledge not to create second level registrations of regional and industry-specific job boards.

Employ Media does not have the support of the military online employment service provider we endorse, VetJobs (www.vetjobs.com), or other military related job boards such as Military.com (www.military.com/www.monster.com) to add second level registrations that will be confusingly similar to established military and veteran related job boards. ICANN should not permit sTLD operators to “route around” the sponsorship eligibility requirements in the sTLD RFP and the protections built into the .jobs Registry Agreement to prevent “abusive registration activities and other activities that affect the legal rights of others.”⁵ Approval would undermine the credibility of ICANN’s commitments in connection with the introduction of new top level domains in general, and “military and veteran community based” sites in particular.

Respectfully,



Donald D. Overton Jr., Executive Director

¹ <http://www.icann.org/en/tlds/new-stld-rfp/new-stld-application-part-15dec03.htm>

² sTLD Applicant responses to request for further information, at page 48 of 177
<http://www.icann.org/en/tlds/stld-apps-19mar04/PostAppC.pdf>

³ Id.

⁴ <http://www.icann.org/en/registries/rsep/jobs-proposal-09jun10-en.pdf> (hereinafter, Employ Media RSEP Request”)

⁵ .jobs Registry Agreement, Appendix S Part VII: Other Provisions (2. “Community Value Criteria”)