

July 13, 2010

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  
USA

RE: Employ Media sTLD Charter Amendment

Dear Chairman Dengate Thrush and Members of the Board:

I am writing on behalf of Indeed.com to urge 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 sponsored top level domain. In addition to employers, Indeed.com, as a search engine for jobs, would be directly and adversely affected, and 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.<sup>1</sup>

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."<sup>2</sup> 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."<sup>3</sup> Employ Media's current request for to permit the "registration, use, and promotions of domains that are not the company names of the registrant"<sup>4</sup> 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.

In addition, expanding the .jobs domain to non-company names is clearly harmful to employers. The sTLD was conceived as a way for job seekers to navigate directly and easily to employers' jobs. The proposed expansion is an abuse of the sTLD's purpose and is contrary to the intent

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

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

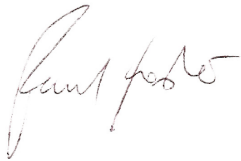
<sup>3</sup> Id.

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

behind its creation. It will cause confusion among job seekers and dilute the value of the .jobs brand to employers. Furthermore, the proliferation of .jobs-based sites resulting from the proposed change is likely to lead to penalization of valid company sites using the sTLD by major search engines like Google and Bing, which will reduce the amount of valuable candidate traffic to employers using the sTLD.

Employ Media does not have the support of online job search providers such as Indeed.com to add second-level registrations that will be confusingly similar to established 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.”<sup>5</sup> Approval would undermine the credibility of ICANN’s commitments in connection with the introduction of new top level domains in general, and “community based” TLDs in particular.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Forster".

Paul Forster  
Co-founder and CEO  
Indeed.com

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