July 8, 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

RE: Employ Media sTLD Charter Amendment

Dear Members of the Board:

As president of Job Search Digest and operator of PsychologyJobs.com, I am contacting you to request 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.

As operator of PsychologyJobs.com, which would be directly and adversely affected, I view the expansion of the .jobs charter to encompass regional and industry-specific second-level registrations as an unwelcome power play in the career site community; a community that has worked to serve job seekers for over a decade.

Under the terms of ICANN’s request for proposals for new sTLDs, applicants are 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. By expanding the .jobs reach, Employ Media is harming both the job board community and the public.

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.” 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."

Employ Media’s current request for to permit the “registration, use, and promotions of domains that are not the company names of the registrant” 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.

You should know that Employ Media does not have the support of online employment service providers such as PsychologyJobs.com.

Adding second level registrations that will be confusingly similar to established job boards will only harm the intended audience - job seekers. And, in times like these, the job seeker needs more help, not harm in their job search process.

We request that ICANN Board of Directors not permit sTLD operators to create a "back door" to get around the sponsorship eligibility requirements in the sTLD RFP and the protections built into the .jobs Registry Agreement. Protections that are there to prevent “abusive registration activities and other activities that affect the legal rights of others.”

Our faith that the ICANN Board will do the right thing is strong.

I appreciate your time and consideration.

Sincerely,

David M. Kochanek
President, Job Search Digest, Operator of PsychologyJobs.com
760.634.4900

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