

July 12, 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 Ray, CA 90290-6601

RE: Employ Media sTLD Charter Amendment

Dear Chairman Dengate Thrush and Members of the Board:

I am writing on behalf of my company Boxwood Technology, Inc and our 1,000 non-profit association clients who are in the job board business 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. Speaking for Boxwood and our .org association clients which would be directly and adversely affected, we oppose the unilateral expansion of the .jobs charter to encompass regional and industry-specific second-level registrations. These associations depend on non-due revenue to sustain their businesses. These organizations represent the full spectrum of the niche, profession specific recruitment marketplace, and in addition many local and state organizations also reflect geo-centric markets. Therefore any unfair encroachment into their space would dramatically affect this important industry, which repurposes non-dues revenues to support their career development and workforce training programs and services vital to rebuilding the jobs economy.

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

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

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 for 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 association industry engaged in online employment service providers 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.”⁵ 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,



John R. Bell, CEO
Boxwood Technology, Inc.

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”)