

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:

CareerBuilder.com respectfully asks that 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. We believe that the entire online employment service community would be directly and adversely affected by the unilateral expansion of the .jobs charter to encompass regional and industry-specific second-level registrations. It would confuse job seekers, decrease the value of the investment employers have made in their corporate career sites, and make it more difficult for staffing firms to reach prospective candidates. Furthermore it would undermine the recruitment efforts of those employers that purchased a .jobs license in good faith and in accordance with the current ICANN charter.

Applicants for new sTLDs – including Employ Media - are required to demonstrate that the proposed sTLD address the needs and interests of the Sponsored TLD Community. In addition, applicants are 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.

In its original 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." Now by requesting a permit for the "registration, use, and promotions of domains that are not the company names of the registrant" Employ Media is proposing to fundamentally alter the Sponsored Community for the .jobs sTLD and eliminate its promise not to create second level registrations of regional and industry-specific job boards.



Employ Media does not have the support of online employment service providers such as CareerBuilder.com to add second level registrations that will be confusingly similar to established job boards. sTLD operators should not be permitted to get around the current sponsorship eligibility requirements in the sTLD RFP and the protections built into the .jobs Registry Agreement that were put in place to prevent abusive registration activities and other activities that affect the legal rights of others. 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.

Thank you for your thoughtful consideration in this critical matter.

Sincerely,

A handwritten signature in black ink that reads "Kevin Knapp".

Kevin Knapp  
Chief Financial Officer  
CareerBuilder LLC