



American Staffing Association

VIA ELECTRONIC MAIL

July 15, 2010

Peter Dengate Thrush, Chairman
Members of the Board of Directors
International Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

Re: .Jobs and Employ Media's Top Level Domain Charter Amendment

Dear Chairman Dengate Thrush and Members of the Board:

The American Staffing Association (ASA) is the national trade association for the U.S. staffing industry. ASA members account for 85% of U.S. staffing industry sales and operate some 14,000 offices throughout the nation. Two million Americans go to work for U.S. staffing companies every business day. ASA members provide a wide range of employment services and solutions, including temporary and contract staffing, recruiting and permanent placement, outplacement and outsourcing, training, and human resource consulting.

We respectfully request that you reject Employ Media's request for authority to permit second level domain registrations that do not correspond to an employer's name in the .jobs sponsored top level domain (TLD).

If the .jobs charter is expanded to encompass regional and industry-specific second-level registrations, the staffing industry would be directly and adversely affected. Such expansion would confuse job seekers through the proliferation of new domains, decrease the value of the investment staffing firms have made in their corporate career sites, and make it more difficult for staffing firms to reach prospective candidates for employment. Furthermore, such expansion would undermine the recruitment efforts of those staffing firms that purchased a .jobs license in good faith and in accordance with the current ICANN charter.

Applicants for new TLDs — including Employ Media — are required to demonstrate that the proposed TLDs address the needs and interests of the Sponsored TLD Community. In addition, applicants are required to demonstrate that the proposed TLD enjoys broad based support of the Sponsored TLD Community.

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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 prohibit registration of occupational, 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 TLD and renege on its representation that it would not create second level registrations of regional and industry-specific job sites and boards.

ASA does not support Employ Media’ efforts to add second level registrations that will be confusingly similar to established staffing firm job sites. Employ Media should not be permitted to circumvent the current sponsorship eligibility requirements 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. Any approval of Employ Media’ efforts 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 consideration in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. C. Dwyer". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stephen C. Dwyer
Deputy General Counsel