



**International Trademark Association**

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**COMMENTS OF THE INTERNET COMMITTEE OF THE INTERNATIONAL TRADEMARK  
ASSOCIATION ON NEUSTAR, INC.'S NEW REGISTRY SERVICE PROPOSAL –  
MODIFICATIONS TO THE EXISTING ADD GRACE PERIOD**

The Internet Committee of the International Trademark Association (INTA) is pleased to provide these comments on NeuStar, Inc.'s ("NeuStar") February 5, 2008 New Registry Service Proposal – Modifications to the Existing Add Grace Period ("AGP Modifications Proposal").

The INTA Internet Committee appreciates NeuStar's willingness to engage in a collaborative dialogue to discuss and identify potential solutions to the problem of domain tasting, its creativity in developing the AGP Modifications Proposal, and its leadership role – along with PIR and Afiliis – in submitting a proposal intended to address the problem. As alluded to in the AGP Modifications Proposal, the Internet Committee would prefer that domain tasting be addressed through the wholesale elimination of the Add Grace Period (AGP). Although the Internet Committee is hopeful that domain tasting can be eliminated across all gTLDs by a policy outcome of the ongoing PDP, the Internet Committee is cautiously optimistic that NeuStar's AGP Modifications Proposal will eliminate domain tasting in the .biz gTLD and supports the AGP Modifications Proposal.

If the AGP Modifications Proposal is approved, the INTA Internet Committee requests that NeuStar (a) identify in its monthly reports to ICANN the Registrars that have requested an "extraordinary circumstances" exception, a general description of the basis for the exception, and whether NeuStar granted the request; and (b) agree to the public disclosure of this information.

INTA ([www.inta.org](http://www.inta.org)) is a 129-year-old not-for-profit membership association of more than 5500 trademark owners and professionals, from more than 190 countries, dedicated to the support and advancement of trademarks and related intellectual property as elements of fair and effective national and international commerce. INTA's Internet Committee is a group of over 100 trademark attorneys and professionals from all over the world charged with developing and advocating policies to advance the balanced protection of trademarks on the Internet. The Committee's policy work is focused on a broad range of issues including evaluating treaties, laws, regulations and procedures relating to domain name assignment, use of trademarks on the Internet, and unfair competition on the Internet.