



**IPC COMMENTS FOR ICANN
On
Initial Report On Proposals For Improvements To The Registrar Accreditation Agreement**

The Intellectual Property Constituency ("IPC") is a constituency of the GNSO and represents the full range of trademark and other intellectual property interests relating to the DNS. IPC members are international, regional and national intellectual property organizations from around the world, corporate entities with intellectual property interests (often as owners of intellectual property), and individuals with an interest in intellectual property matters. The IPC appreciates this opportunity to provide its comments on the Initial Report on Proposals for Improvements to the Registrar Accreditation Agreement posted for comment on 28 May 2010 (the "Initial Report").

The IPC is supportive of the call for the development of a Registrant's Rights and Responsibilities Charter as outlined in Chapter 3, section 2 of the Initial Report and supports the further work by the At-Large Community and other constituents, on the proposed "aspirational charter" described in Chapter 3, section 1 of the Initial Report. The IPC also wishes to publicly state its general support for the list of topics for further amendments to the Registrar Accreditation Agreement ("RAA") set forth in Chapter 4, Section 3 of the Initial Report. Lastly, the IPC strongly believes that parties affected by the terms of the RAA should have a formal role in the future negotiations of any amendments to the agreement. At a minimum, the IPC believes that such parties should be allowed to participate as observers to the negotiations.

In closing, the IPC would like to extend its thanks and appreciation to the members of the joint ALAC-GNSO RAA Drafting team for their efforts on these issues.