



December 11, 2012

Ms. Karen Lentz
Director, Operations & Policy Research
Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

Dear Ms. Lentz:

We are encouraged that ICANN opened the comment docket for the Trademark Clearinghouse Strawman Solution and the Limited Preventative Registration (LPR) Proposal on November 30. However, the comment period, and the reply comment period, are too short to elicit meaningful responses to the numerous complex and detailed issues involved, as they offer a mere 21 and 19 days to provide input, respectively. They occur during the holiday season, when many individuals are traveling and offices are short-staffed. Furthermore, it is our understanding that these items are on the agenda for a December 20 GNSO Council meeting; thus, comments submitted after December 18 or so will not be considered by the GNSO and will essentially be meaningless. This is particularly true with regard to the Limited Preventative Registration proposal, since this will not move forward absent GNSO intervention.

Many in the brand community believe that the Strawman Solution does not go far enough to protect consumers from on-line harm. Therefore, brandholders require sufficient time to provide the ICANN community with facts, figures and specific examples demonstrating the necessity of the LPR mechanism, and how it will work in practice. While we understand that ICANN believes that it is under extreme time pressure to complete the Trademark Clearinghouse, the Internet stakeholder community must be afforded sufficient time to develop a consensus-driven, fact-based solution that is supported by the record.

Because consumer protection – a key tenet of ICANN's Affirmation of Commitments – is involved so significantly in these matters, we respectfully request that the comments deadline be extended to January 30, 2013, with reply comments required to be filed by February 28, 2013.

We appreciate your consideration of our request.

Sincerely,

Daniel L. Jaffe
Group Executive Vice President, Government Relations