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Office of the General Counsel

January 15, 2013

Fadi Chehadé  
ICANN  
4676 Admiralty Way, Suite 3300  
Marina del Rey, CA 9092-6601

**Re: Comment Supporting the “Strawman Solution” and “Limited Preventative Registration”**

Dear Mr. Chehadé:

Chrysler Group LLC (“Chrysler”) is pleased that ICANN is considering the concerns of trademarks owners and making efforts to improve the new gTLD rights protection mechanisms. Chrysler supports the adoption of the proposed revisions set forth in the “Strawman Solution” and the “Limited Preventative Registration”.

Specifically, with respect to the “Strawman Solution,” the revision requiring registries to provide at least 30 days advance notice of the opening of the Sunrise registration period is necessary for effective participation in Sunrise by trademark owners. Without sufficient advance notice, trademark owners will not be able to monitor the rules and launch periods of the vast number of new registries, and the likely result would be missed opportunities to adequately protect trademark rights.

Chrysler also supports the extension of the trademarks claims service to 90 days, although this period could be extended even further. Thus, Chrysler also supports the proposal of the “Claims 2” service, extending the Claims service to a minimum of 6-12 months for a fee. However, the fee should be set only at the amount necessary to cover increased Clearinghouse administration costs, and it should not be prohibitively expensive for trademark owners.

Like many trademark owners, Chrysler is concerned about the massive increase of cybersquatting that will likely occur with the introduction of so many new “open” gTLD registries. Therefore, Chrysler also supports the inclusion of domains previously determined to have been abusively registered or used. However, trademark owners should be able to include as many domains that meet the criteria as possible. If the domains have been abusively registered, there should be no limit on the number that can be included.

Finally, Chrysler also supports the Limited Preventative Registration as an efficient method for trademark owners, who likely have limited or no interest in actively



using certain domains, to prevent second-level registration of their trademarks. Again, provided that the fee is reasonable and not cost-prohibitive to brand owners, this appears to be a method that will hopefully reduce the number of defensive registrations.

Thank you for your consideration. Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen I. Spano".

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