



**InterContinental Hotels Group (IHG) Comments
on
"Locking" of a Domain Name Under UDRP Proceeding
August 15, 2012**

InterContinental Hotels Group (IHG) welcomes the opportunity to provide input to the Policy Development Process (PDP) Working Group established by the Generic Name Supporting Organization (GNSO) to develop a clear understanding of the nature and scope of issues that may be encountered with the "locking of a domain name" subject to the Uniform Domain Name Dispute Resolution Policy (UDRP). IHG is the world's largest hotel company by number of rooms with more than 666,000 rooms in more than 4,500 hotels in over 100 countries. IHG has been an industry leader in utilization of the Internet for productive and innovative commerce in support of the consumers seeking to use its nine hotel brands and its Priority Club Rewards hotel loyalty program.

During the past 11 years, IHG has extensively used the UDRP to deal with many incidents of cybersquatting, including the largest UDRP proceeding, which resulted in the transfer of 1,519 domain names, *Inter-Continental Hotels Corporation*, *Six Continents Hotels*,

Inc. v. Daniel Kirchhof, WIPO Case No. D2009-1661. Because of the delay between the date on which a UDRP complaint is filed and the date on which the service provider commences the proceeding, a domain name can be transferred before the proceeding truly begins in earnest – a threat that IHG encounters in every UDRP complaint it files.

Thus, it is highly important that the UDRP system require that, upon the filing of a UDRP complaint, the Registrar must proceed to immediately lock down the domain(s) in question, preventing any changes to the domain name(s) until the UDRP proceeding has been completed – as required by the spirit if not the letter of paragraph 7 of the UDRP , which says that a UDRP service provider may “not cancel, transfer, activate, deactivate, or otherwise change the status of any domain name registration” until a UDRP proceeding has been concluded. This locking should occur whenever a registrar is first notified that a complaint has been filed, whether by a Complainant, a UDRP service provider or otherwise.

We trust that the continuing efforts of the PDP Working Group will lay out the specific conditions for the "locking" procedure to be contained in the UDRP Provider communications. However, we also believe that once a domain is locked there can be no change or modification in the registrant information for that domain until the UDRP Proceeding is concluded.

We look forward to reviewing the coming submittals of the PDP working group and to expressing our views when the next version is published.

Sincerely,

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Chief Intellectual Property Counsel
InterContinental Hotels Group