



**IPC COMMENTS FOR ICANN
on
Initial Report on Vertical Integration Between Registrars and Registries**

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 Vertical Integration Between Registrars and Registries posted for comment on 23 July 2010.

The issue of vertical integration is of deep importance to the IPC and its membership. The IPC generally supports the strict separation approach approved by the ICANN Board on March 12, however, appropriate exceptions to this approach should be recognized for <.brand> registries, *i.e.* a single registrant registry. The IPC also believes there may be other single registrant registries that would be unduly restricted by the current ban on vertical integration and/or cross-ownership between Registries and Registrars. The IPC hopes to be able to collaborate with other constituencies and stakeholder groups to come up with a framework for a workable exception to the prohibition to vertical integration that can be presented to the VI working group for inclusion in its final report.

The IPC would also like to take the opportunity to extend its thanks and appreciation to the members of working group for their efforts on this issues.