



To
Mr. Cherine Chalaby, Chair of the New gTLD Committee
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

Email : comments-closed-generic-05feb13@icann.org

March 8, 2013

Dear Ms Chalaby,

Re: Closed Generic Top-Level Domains (gTLDs)

The International Publishers Association (IPA) is an international industry federation of national publishers associations, representing all aspects of book and journal publishing from around the world. Established in 1896, IPA's mission is to promote and protect publishing and to raise awareness for publishing as a force for economic, cultural and political development. Around the world IPA actively fights against censorship and promotes copyright, literacy and freedom to publish. IPA is an industry association with a human rights mandate.

I am writing to you on behalf of IPA to express the opposition of the global publishing industry to closed generic gTLD applications. We have a particular concern, should the closed generic gTLD application for the TLD “.book”, that was submitted to ICANN by Amazon EU S.a r.l., be successful.

We do not believe that an individual for-profit company should be able to obtain the right to control all uses of the “.book” ending without any clear guidance that ensures fair and equal access.

The ending .book is not just a generic descriptor. It has a connotation of quality, authority, scholarship, authenticity. Potential registrants include authors, agents, book shops, fan sites or other publishers or book platforms. For many users it may also indicate an original ownership of, or interest in, relevant publishing rights. This means that there is a particular significance in the ownership of a .book domain name.

It is in the public interest that the domain name .book therefore remains outside of the control of an organization that has an interest in competing with or exerting economic pressure in a contractual commercial relationship on persons who would like to register such a domain name. Such registrants have a recognised ulterior interest in obtaining and managing such domain names without the constraints of a particular commercial partner.

A company that clearly puts its own commercial goals ahead of the interests of the authors and publishers of relevant books, should not be given the right to administer a “closed generic” gTLD applications.

Whilst the above has been argued in particular with the application of Amazon in mind, it applies to any other applicant who wishes to maintain a closed registry, and has an ulterior motive to influence or exert economic pressure on potential registrants.

Instead we suggest that ICANN should find that it is in the public interest to require all applicants for the “.book” TLD to operate an “open registry” for the particular generic gTLD at issue, and follow an open, transparent, and rules based application process.

On behalf of IPA, thank you for taking our concerns into consideration.

Yours sincerely


Jens Bammel
Secretary General