



Alarm Industry Communications Committee

March 5, 2013

Via Email

Dr. David Crocker, Chairman of the Board
Mr. Fadi Chehade, President & CEO
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

**Re: *Application of Symantec Corporation for closed gTLD “.security”
Applicant ID: 1-1027-69486***

To Whom It May Concern:

The Alarm Industry Communications Committee ("AICC") submits this letter of objection to the closed generic top level domain ("gTLD") use of the string “.security” proposed by Symantec Corporation (“Symantec”) in the above referenced application to the Internet Corporation for Assigned Names and Numbers (ICANN). As discussed below, AICC and its members do not begrudge Symantec the use of the string “.security”, and recognizes Symantec as a reputable company providing valuable software protection services to the public. However, it is respectfully submitted that Symantec should not be granted exclusive use of this string (i.e., closed domain status), since there are thousands of companies large and small that provide security services to the public, and many of these companies have been providing these services for decades longer than Symantec has been in business.

AICC is comprised of representatives of the Central Station Alarm Association (CSAA), Electronic Security Association (ESA), Security Industry Association (SIA), Bosch Security Systems, Digital Monitoring Products, Digital Security Control, Telular Corp, Stanley Convergent (alarm division, formerly known as Honeywell Monitoring), Honeywell Security, Vector Security, Inc., ADT Security Services, Inc., AES- IntelliNet, Alarm.com, Bay Alarm, Intertek Testing, RSI Videofied, Security Network of America, United Central Control, AFA

Protective Systems, Vivint (formerly APX Alarm), COPS Monitoring, DGA Security, Security Networks, Universal Atlantic Systems, Axis Communications, Interlogix, LogicMark, Napco Security, Alarm Detection, ASG Security, Protection One, Security Networks, Select Security, Inovonics, Linear Corp., Numerex, Tyco Integrated Security, FM Approvals, and the Underwriters Laboratories.

ESA and CSAA, representing the alarm monitoring and installation industry sector, collectively have 2434 member companies providing alarm service to the public. Together with these trade association members, AICC member companies protect a wide range of sensitive facilities and their occupants from fire, burglaries, sabotage and other emergencies. Protected facilities include government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, schools and universities. In addition to these commercial and governmental applications, alarm companies protect a large and ever increasing number of residences and their occupants from fire, intruders, and carbon monoxide poisoning. Alarm companies also provide medical alert services in the event of medical emergencies.

Establishing .security as a closed gTLD would not be appropriate in light of the broad nature of the term “security”, and the public’s perception of this term. While Symantec is involved in one aspect of this industry (software security), a large portion of the public associates “security” with the services provided by company’s such as AICC’s members. In 2010, there were approximately 6,630 establishments providing security system monitoring services, according to the U.S. Census Bureau. These businesses generated nearly \$15.8 billion in revenues and employed an estimated 100,800 people who earned a total annual payroll of almost \$4.4 million. Security monitoring system coverage was distributed relatively evenly among residential, commercial, and industrial locations, with the number of monitored locations totaling well over 32 million.¹ More and more, security monitoring services involve use of the Internet, especially security services associated with “smart home” systems.² Since domain names serve as “humanly memorable names for Internet participants”³, access to the string “[companyname].security” should not be denied to an entire industry that tens of millions of Americans associate with the word security. Such denial of access would lead to consumer confusion, and place security companies at a competitive disadvantage in marketing their services on the Internet. A generic term like “security” should be available to all members of the broad security industry to use.

AICC notes that denying closed status to the .security gTLD is also appropriate because (1) there are already two other applicants for this string (Defender Security Company and Fern Trail LLC), and (2) Symantec is simultaneously requesting closed use of three other gTLDs that are more appropriately associated with its role as a software security company: .protection, .cloud and .antivirus. See Symantec response to Item 18(a). These terms better reflect the specialized aspect of the security world served by Symantec.

¹ See <http://business.highbeam.com/industry-reports/business/security-systems-services>

² Security monitoring companies such as ADT offer smart home services: “Smart home systems provide exceptional security solutions which will make you, and your family, feel more in control of your home.” <http://www.adt.com/home-security/learning-center/security-topics/technology-security/make-your-home-smart>

³ http://en.wikipedia.org/wiki/Domain_name

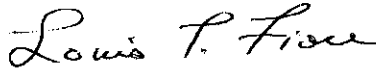
In summary, granting Symantec closed status for the gTLD .security would lead to string confusion, would not serve the public interest and would not fully reflect the membership of the security community.

Thank you for considering the above information.

Respectfully submitted,

**ALARM INDUSTRY COMMUNICATIONS
COMMITTEE**

By:



Louis T. Fiore, Chairman

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