



Thank you for opening a forum for public comment on "closed" generic gTLD applications and whether specific requirements should be adopted corresponding to this type of application.

Consumer Watchdog is a tax-exempt 501(c)(3) nonprofit organization dedicated to educating and advocating on behalf of consumers for over 25 years. Through policy research, investigation, public education, advocacy (including litigation), and direct consumer outreach, Consumer Watchdog has helped millions of Americans save billions of dollars on their insurance bills, secure the quality health care they need, and, for low-income consumers, gain access to important programs. We have also worked hard to protect consumers online privacy.

I am writing to express Consumer Watchdog's concern over how closed generic Top Level Domains could hurt competition on the Internet. We are also concerned about giving any one company the right to decide who can use a gTLD. If a gTLD is granted to a company, it should generally not be "closed." Any company that can demonstrate an interest in the generic TLD should be allowed to use it.

What really concerns Consumer Watchdog are blatant attempts by such companies as Google and Amazon to buy control of huge swaths of the Internet by purchasing truly generic Top Level Domains and operating them as closed domains for their own use.

Clearly generic terms such as .security or .search ought not be allowed to be operated as closed domains. Any business that provides security services, for example, ought to be able to use the .security domain. Similarly any search operator should be entitled to use .search.

We believe the plans by Google and Amazon are extremely problematic. You should either deny their applications or at a minimum require the generic TLDs to be opened to all with a clear interest in the term. It is one thing to use a Top Level Domain name that is associated with your brand name. In Google's case that might be .Google or .YouTube or .Android. Similarly it makes sense for Amazon to acquire .Amazon or .Kindle. But, that is not, as we understand it, what they are seeking.

Google, through its subsidiary Charleston Road Registry Inc., has ponied up \$18.7 million in its application to buy 101 domain strings like .eat, .buy, .book, .free, .web, and .family. Amazon is close behind the Google, applying for 76 domain strings including such names as .free, .like, .game, and .shop.

Generic words used in a generic way should belong to all people. However, if you allow individual registry operators like Google and Amazon to segregate and close-off common words for which they do not possess intellectual property rights and that are not associated with brand names you will allow them to circumvent nation-states' entrenched legal processes for obtaining legitimate and recognized trademark protections.

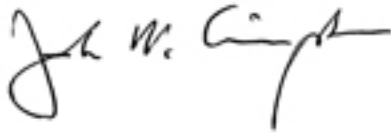
At a minimum they should be required to operate these generic TLDs in an open manner

available to virtually all comers. It would be best if they did not control them.

If these applications are granted and operated on a closed basis, large parts of the Internet would be privatized and become walled gardens. It is one thing to own a domain associated with your brand, but it is a huge problem to take control of generic strings and operate them for your own use. Both Google and Amazon are already dominant players on the Internet. Allowing them to control generic domain strings would threaten the free and open Internet that consumers rely upon.

We are skeptical that such powerful companies would operate generic TLDs in a fair way and think it best if such Internet giants were denied any control of generic TLDs. At a minimum Consumer Watchdog believes ICANN must insist that all generic TLDs be operated on an open basis, available to anyone who shows they have an interest in the generic term, thus ensuring that the Internet continues its vibrant growth while serving the interests of all of its users.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "John M. Simpson". The signature is fluid and cursive, with a large initial "J" and "S".

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