In the interest of participating in the bottom up model adopted by the Internet Corporation for Assigned Names and Numbers (ICANN), please accept these comments on behalf of Dot Registry, LLC with respect to the Section IV.1.b – Safeguard Advice for New gTLDs and the associated Annex I (Safeguards) and IV.1.e-Community Support for Applications, of the Government Advisory Council’s (GAC) Beijing Communique issued on April 11, 2013.

Dot Registry, LLC has applied for the extensions “.CORP”, “.INC”, “.LLC”, “.LLP”, and “.LTD” to be used as business identifiers. It is the opinion of Dot Registry, LLC that the Safeguards proposed by the GAC is in the best interests of registrants, Internet users, and those charged with managing business registrations. The benefits achieved by the Safeguards as proposed by the GAC outweigh the costs, and should be implemented as advised.

ICANN is based on a bottom-up, multi-stakeholder, consensus-driven policy model. At the base of this model is the end user. To disregard the GAC Safeguards with respect to the business entity identifying strings is to put the business interests of the Registry operators above the best interests of those impacted by the new top-level domains. Question 18(b) of the Applicant Guidebook asked each applicant to detail how the proposed gTLD will benefit registrants, Internet users, and others, the GAC Safeguards serve to mitigate the potential harm that would result from the wide-open use of these business entity identifiers.

With respect to the “.CORP”, “.INC”, “.LLC”, and “.LLP strings, the GAC Safeguards simply provide clear steps that a Registry operator must undertake. Many applications for these strings contain a number of ambiguous, open-ended restrictions or verification procedures, which cannot be viewed as being long-term beneficial to registrants or Internet users. The particular extensions are directly associated to business entity registration types and represent a clearly defined community in the United States. Both consumers and businesses readily recognize these abbreviations as denoting a registered business. Assumptions are made by consumers by seeing these abbreviations in conjunction with a business name. These strings are not in need of new definitions created at the discretion of applicants nor should their importance be taken lightly. The government officials that manage the legal standing of businesses, business registrations and corporate filings do not need the added task of protecting their constituency from business identity theft or mis-representation online created by the unmonitored, unstructured issuance of these extensions. Further, to ensure the long-term integrity of these extensions we would encourage ICANN to issue these strings under community designations, which is the only way to provide the necessary securities and enforcement mechanisms to protect the US registered business community.

Considering the well intentioned yet exceedingly vague commitments made by a number applicants for the “.CORP”, “.INC”, “.LLC”, and “.LLP” strings, it is understandable that the GAC would take action and that the action of the GAC would be received with such resistance. It is disappointing that those familiar with the bottom-up, multi-stakeholder, consensus-driven policy model of ICANN would need a directive to give due consideration to the businesses and those agencies tasked with managing registering them, essentially, the true stakeholders and bottom of the model. The fact is, by applying the GAC Safeguards to strings that designate a business entity you will insure that the Internet serves the user and strengthens the value proposition of these strings, creating integrity and confidence for end users.