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Via Electronic Mail

Mr. Jamie Hedlund
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Internet Corporation for Assigned Names and Numbers
1101 New York Ave, NW
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Washington, DC 20005
comments-gac-safeguard-advice-23apr13@icann.org

Re: American Insurance Association Comments on the Government Advisory Committee's (GAC) Beijing Communiqué

Dear Mr. Hedlund:

The American Insurance Association (AIA) appreciates the opportunity to reply to comments regarding how the New gTLD Board Committee should address the GAC advice contained in the Beijing Communiqué (Communiqué). AIA is the leading property-casualty insurance trade organization, representing approximately 300 insurers that write nearly \$100 billion in premiums each year. Our members offer a variety of property-casualty insurance, including personal and commercial auto insurance, commercial property and liability coverage for businesses, homeowners' insurance, workers compensation, product liability insurance, and medical malpractice coverage. AIA believes that the GAC Communiqué mistakenly included .travelersinsurance in the list of financial-related gTLD strings that require heightened safeguards.

Travelers is a well-recognized international brand that has provided consumers with insurance coverage since the mid 1800's.¹ Travelers provides a broad range of insurance products including, but not limited to: automobile, homeowners, boat, commercial property, casualty, inland marine, and many more. Due to the diverse nature of the products offered by Travelers through use of the "Travelers" trademark, it is clear that .travelersinsurance is a brand-related gTLD application (".brand application") and is not a generic string associated with a single type of insurance product. This is further evidenced by the fact that Travelers is applying for .travelersinsurance (emphasis added). Internationally, consumers refer to an insurance product purchased to cover risks while traveling as "travel insurance" and not "travelers

¹ <https://www.travelers.com/about-us/flash/history.html> ; also see www.travelers.com for general company and product information.

insurance.” Accordingly, .travelersinsurance is not a generic string in the insurance or financial services sectors.

In addition, it is inconsistent and imbalanced to single-out Travelers from other insurance and financial services .brand applicants that have also applied for brand-related strings. Like these brand-related gTLD applicants, Travelers is simply applying for a gTLD string directly associated with its brand name.

For the reasons stated above, .travelersinsurance does not raise any concerns that it is a generic term that could create consumer confusion. Consumers are abundantly aware that .travelersinsurance is a brand name associated with a company (Travelers) that sells numerous types of insurance products.

AIA thanks ICANN for this opportunity to comment and we are happy to provide any additional information needed or answer any questions associated with the above issue.

Sincerely,

A handwritten signature in cursive script that reads "Angela Gleason".

Angela Gleason
Associate Counsel