



August 27, 2013

Mr. Fadi Chehadé
Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

Dear Mr. Chehadé:

We write on behalf of the Intellectual Property Owners Association (IPO) to express support for ICANN's recent request for public comments on ICANN's New gTLD Collision Risk Mitigation Proposal, released August 5th, 2013 (Proposal).

The Interisle Consulting Group study commissioned by ICANN as well as VeriSign's March 28th New gTLD Security and Stability Report raise serious concerns regarding name collisions that may result from the upcoming introduction of new gTLDs. As discussed in both, certain new gTLD strings may overlap with established private intranet domain names and cause significant data security and stability issues if unaddressed. Many corporations could potentially be affected by these name collision risks and will need to thoroughly evaluate their internal DNS systems for potential issues. However, because of the very technical nature of this potential risk, it will require some time for corporations to fully evaluate their internal DNS systems and how the Proposal may or may not effectively mitigate any potential risk.

The 21-day period for filing comments is inadequate because it does not afford those most likely to be affected by potential name collisions sufficient time to fully evaluate ICANN's Proposal and potential issues that may arise within their internal DNS systems from name collisions.

Accordingly, IPO respectfully requests that the period for filing public comments on the Proposal be extended until November 1, 2013. This additional time will allow corporations and others potentially affected by name collision risks to fully evaluate any potential harm and provide informed comments to ICANN.

Thank you for your consideration of an extension of the period for the filing of comments.

Sincerely,

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