



**Etienne Sanz de Acedo**  
Chief Executive Officer

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Submitted to: comments-tmch-review-25jul16@icann.org

August 26, 2016

Ms. Antonietta Mangiacotti  
Lead Researcher  
ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2356

Re: Independent Review of the Trademark Clearinghouse Services Draft Report

Dear Ms. Mangiacotti:

The International Trademark Association (INTA) welcomes ICANN's efforts to review the effectiveness and costs of the Trademark Clearinghouse (TMCH). We have studied the Independent Review of the Trademark Clearinghouse (TMCH) Service Draft Report ("the Independent Report") and note that the issues raised are also in consideration by the Rights Protection Mechanisms Working Group (RPM-WG) commissioned by the GNSO Council. In view of this overlap, we have opted to submit a comprehensive set of comments when the RPM-WG's draft report is issued. The RPM-WG is specifically looking at the Independent Report as part of its work on the TMCH. Many INTA members are actively participating in the RPM-WG, including in the TMCH subgroup, and INTA intends to comment upon all TMCH issues in the context of the RPM-WG in order to reduce redundancy and ensure consistency and clarity.

The foregoing notwithstanding, INTA also notes that the drafters of the Independent Report adopted a fairly narrow remit for the review, which could not be considered as "comprehensive." ICANN should explore ideas contributed through public comments submitted at the ICANN55 Marrakech meeting. In particular, any review of the TMCH must include an analysis of introducing competition to the monopoly enjoyed by the operator of the TMCH. Competition would have the effect of driving down prices and improving service offerings relating to the TMCH. Should you have any questions, I invite you to contact Lori Schulman, INTA's Senior Director of Internet Policy at 202-261-6588 or at [lschulman@inta.org](mailto:lschulman@inta.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Etienne Sanz de Acedo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Etienne Sanz de Acedo  
Chief Executive Officer