

Hewlett-Packard Company: Comments to ICANN Introduction of Two-Character Domain Names in the new gTLD Namespace

Comments due: Thursday, July 10th

Hewlett-Packard Company (HP) hereby submits comments in response to ICANN's request for comments entitled, "Introduction of Two-Character Domain Names in the new gTLD Namespace." HP appreciates the opportunity to participate in the open dialogue and comment process on the potential introduction of two-character domain names in the new gTLD namespace "left of the dot." HP supports the introduction of such domain names, including 'HP', where and when they do not conflict with a country code or government operator.

Specifically, HP supports the proposed amendments to the Registry Agreements to implement a new registry service, which would permit the introduction of two-character domain names for registration in the new gTLD namespace resulting from the Registry Services Evaluation Process (RSEP) requests submitted by several registries.

Enabling the use of two-character domain names that do not conflict with country codes gives Registry Operators the opportunity to offer global companies like HP tailored segmented domains for our consumers. HP, a global company founded in 1939, does business in over 160 countries, has over 300,000 employees, and had over US\$ 112 billion revenue in 2013. We have an interest in this new proposal to allow us to utilize the full array of marketing and brand protection opportunities presented by the new gTLD system. Further, we note that HP's longstanding use of our two-character name 'HP' "left of the dot" in previously existing TLD's (including .com) has caused no confusion or interference with any country code domain, government or corresponding country code operator.

In its Public Comment announcement, ICANN acknowledged that it has undertaken a preliminary review, which revealed that these requests would not affect the security or stability of the Domain Name System. HP believes the ability to use two-character domain names like 'HP' is an enhancement that supports the goals and future of the Internet sphere. The growth of a global economy is strongly linked to a company's ability to connect with their consumers, both current and future.

In summary, HP supports the introduction of these two-character domain names such as 'HP' where there are no current conflicts with the country codes or government codes.

Respectfully submitted,

Casey Nakata

Director of Trademarks and Copyrights

Hewlett-Packard Company (HP)