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Re. New gTLDs – Pre-registration

We refer to ICANN's announcement regarding pre-registrations for new gTLDs. We strongly oppose such pre-registrations.

We are concerned that ICANN is not focusing sufficiently on resolving the overarching and fundamental issues such as trademark protection and might instead be trying to speed up the launch process for an unlimited number of new gTLDs. The proposal for pre-registrations seems premature as ICANN has still not demonstrated that the need for and the benefits of the new gTLD program outweigh the risk and cost to trademark owners and consumers. We urge ICANN to solve the overarching issues before continuing work on any pre-registration process, if such a process is even needed.

The suggested pre-registration process will force trademark owners who have no interest in the new gTLDs into defensively pre-registering in order to protect their trademarks from speculators who are willing to pay the \$ 55,000.

In our opinion, there is no need for more defensive registrations.

On behalf of the following companies:

Arla Foods amba
ROCKWOOL INTERNATIONAL A/S
Bang & Olufsen a/s
Scandinavian Tobacco Group A/S
Novo Nordisk A/S
Coloplast A/S
ECCO Sko A/S
Vestas Wind Systems A/S
The IPR Company I/S
VKR Holding A/S
Bestseller A/S
Danfoss A/S
Danisco A/S
Carlsberg Breweries A/S



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Yours sincerely,
LEGO Juris A/S

Peter Kjær
Deputy General Counsel

A handwritten signature in blue ink, appearing to be "Peter Kjær", written over the typed name and title.