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New gTLD Program – Draft Expressions of Interest/Pre-Registrations Model

Dear Sir / Madam,

We are writing to you on behalf of UBS AG, one of the largest financial institutions in the world.

UBS opposes the proposal to allow Expressions of Interest and Pre-Registrations (EOI) for the new gTLDs. We believe that the new gTLD program should be delayed pending research into whether there is an economic justification for the new gTLDs and whether there are the tools needed to protect consumer and brand holder rights.

Economic justification for the new gTLDs

UBS is still unaware of any global independent study that shows there is a real economic benefit for the new gTLDs.

At present, we are concerned that the majority of applicants will be corporations that feel obligated to apply for gTLDs purely for defensive reasons, even though they do not believe there is a real demand or need for the new gTLD program. This result is neither in brand holders' nor the public's interest. ICANN should therefore not implement new gTLDs until an economic justification is provided through an appropriate independent study.

Tools to Protect Against Brand Abuse

It is possible that the new gTLD program could lead to hundreds, if not thousands of new gTLDs. This is likely to cause brand abuse, such as cyber squatting, to grow exponentially. As a result, the legal costs for brand owners associated with monitoring, registering and enforcing domain names are likely to raise substantially.

Despite the above, there is no agreed model for protecting the rights of brand holders.

For the above reasons, we do not support introducing a model that permits Expressions of Interest and Pre-Registrations until it is confirmed that there is an economic justification for gTLDs and until there are agreed criteria to protect the rights of brand owners.

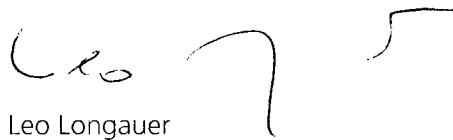
UBS thanks you for the opportunity to provide these comments.

Yours sincerely

UBS AG



Andrew Denholm
Director



Leo Longauer
Executive Director