



Adobe Systems Incorporated

801 North 34th Street
Seattle, WA 98103-8882
Phone 206 675.7000

January 22, 2010

Internet Corporation for Assigned Names and Numbers (ICANN)
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

Re: Expressions of Interest and Pre-Registration Model for New gTLDs

Dear Sir/Madam:

Adobe Systems Incorporated (“Adobe”) respectfully submits the following comments regarding ICANN’s Draft Expressions of Interest and Pre-Registration Model for New gTLDs (EOI), published on December 18, 2009.

Adobe opposes the proposed concept of a Pre-Registration and Expressions of Interest process (EOI). At this stage, ICANN has yet to fully address the overarching issues including trademark protection, security and stability of the Internet, and economic demand that it has committed to resolving prior to the introduction of new gTLDs. Adobe strongly believes that ICANN must complete the necessary work on these vital issues prior to moving forward with an EOI process.

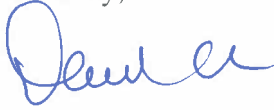
As we’ve stated previously, ICANN has still failed to produce either an economic feasibility study or any other independent documentation justifying the proposed implementation of the new gTLDs as well as their proposed costs. ICANN’s current justification for the proposal appears to run contrary to the interests of most brand owners, who are justifiably concerned about expense, security and enforcement issues. ICANN’s continued failure to address this gating issue remains a major concern for Adobe and other brand owners.

Requiring the submission of an EOI in order to be eligible for a new gTLD will have the negative consequence of forcing brand owners to file defensive applications in an effort to pre-register and protect their trademarks. Moreover, it will require businesses, communities and other potential applicants to commit to a process that remains as yet undefined and invest financially in a program without a specified launch date. With the overarching issues remaining unresolved, and the criteria for new gTLDs not yet finalized, we contend it is ill advised to introduce new processes and policy to the gTLD proposal at this time.

Adobe thanks you for your time and attention to this matter. We look forward to working with you to identify a solution that would better address the concerns of Adobe

and other trademark owners and will avoid the unintended and undesirable consequences that we believe will result from the Pre-Registration and Expressions of Interest process as currently proposed. Please feel free to contact the undersigned if you have any questions about this submission.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel C. Poliak".

Daniel C. Poliak
Associate General Counsel
Adobe Systems Incorporated
801 N. 34th Street
Seattle, WA 98103
Phone: 206-675-7000