



The Internet Corporation for
Assigned Names and Numbers
ICANN
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292
USA

Att.: Dr Paul Twomey

4th December 2008
PK/mma

Re. New gTLDs - .brand

Dear Dr. Paul Twomey,

We would like to draw your attention to some grave concerns we have regarding the prospect of the release of new gTLDs, also known as .brand, in the version according to the current released draft. We address you in your capacity as President and CEO of ICANN in the hope that you will put forward our arguments and suggestions. We see several critical issues in such a release and our concerns are not lessened by the high costs involved in the acquisition and maintenance of these gTLDs. We have no reason to believe that such a cost would deter any adverse party significantly and we fear that the gTLDs will become very costly for brand owners, especially forcing brand owners to escalate the use of defensive registration as well as being forced to escalate surveillance. We believe that the process of releasing the new gTLDs in the proposed form should be stopped or postponed as we neither see any need nor wish for such gTLDs. We are aware that the process is likely to be carried forward and we would thus like to advocate for certain changes in regard to both the process and the principles for the new gTLDs.

As mentioned, we are concerned about several issues but for the sake of clarity we have, however, chosen to address only three material issues in this letter.

1. We believe that the system would be improved drastically if brand owners are given the possibility of blocking or parking certain TLDs which contain the brand owner's trademark. The brand owner should have the possibility of acquiring the TLD at a very low cost and without being obliged to implement an infrastructure or to use the TLD. Such a possibility would minimise the risk of unjustified registrations by third parties and reduce the brand owners' cost of protecting their brands. The TLD, and variants thereof, should in the process of registration be treated and handled as a normal registration.

2. We are aware that the high fee for acquisition and maintenance of the new gTLDs is intended as a mean to reduce the risk of unjustified registrations of the actual gTLDs. However, it is our firm belief that the risk of unjustified registration of infringing sub-domain names under the new gTLDs is in no way reduced. It is important that general terms and conditions are implemented for all new gTLDs in order to secure a.o. appropriate opposition procedures. Today there are 12 gTLDs and after the new release there might be 200-800 new gTLDs. This puts a substantial burden on brand owners when trying to protect and police their brands. Sanctions against unjustified registrations of domain names under the new gTLDs are also needed and we would very much welcome a solution where the party who wins a domain name dispute is awarded costs.



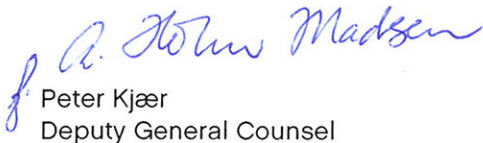
3. It is our understanding that the new gTLDs must be administered by the domain name owner itself and not by an internet service provider. This is a very inexpedient procedure and we believe that it will be beneficial to open up for the possibility of outsourcing the technical administration to an internet service provider. This will again lessen the burden on brand owners.

We believe that our concerns are well-founded and we assume that you will address these concerns with the proper seriousness and within the right forum. We are more than willing to discuss all of our concerns with you and to elaborate on this letter.

On behalf of the following companies:

Danfoss A/S
Hempel A/S
Novo Nordisk A/S
Coloplast A/S
H. Lundbeck A/S
Vestas Wind Systems A/S
Arla Foods amba
Bang & Olufsen a/s
Grundfos A/S
Bestseller A/S

Yours sincerely,
LEGO Juris A/S

A handwritten signature in blue ink, appearing to read "Peter Kjær".
Peter Kjær
Deputy General Counsel