

## CentralNic Draft IRT Comments

Dear Sirs,

We write further to the published draft IRT report and thank you for the opportunity to comment. We would also like to state that we truly believe there are many sound recommendations proposed.

That said, we have a couple of concerns we would like to share:

Firstly, we do not believe that the Globally Protected Marks List is a sound option, rather a utopian proposal that would not work in reality. In fact, it is our opinion as a Registry of fifteen years standing, that it will be burdensome and cause many more problems than it would solve.

Maybe we have misunderstood the intention, but it reads to us that generic names can get on the list. For example, TIME. How can the brand holder for Time be entitled to time.everything at the 2<sup>nd</sup> -level, or given preferential treatment over any legitimate prospective registrant of this generic word, that their actual trademark most certainly would not cover?

We also feel that that this proposal will cause umbrage with brand-holders who don't quite meet the barometer set in this draft, and which propose a different set of rules than already established in the existing top-level spaces.

Furthermore, we consider the list proposal, "a sledgehammer to crack a nut," especially in terms of the costs compared to the usefulness and accuracy of such a list, and seems to want to substitute long-standing intellectual property legislation and doesn't seem to add much value. Conversely, it will cost significantly to others.

In closing this topic, I hope I will be forgiven for saying that a minority part of our community has long since proposed the 'list' notion and consistently failed to deliver evidence of practicality.

Our other comments relate to the proposal that all Registries be "thick".

Our Registry has been thick since we started 15 years ago but we don't think it is "essential" today, as stated in the draft, for the following reasons, including the fact that a Whois Task Force set up by ICANN did not conclude that thick registries should be mandatory and it was never required for previous applications.

Thirdly, we understand that Registrars will be required to escrow data. Doesn't this mean that keeping this data at the registry level is unnecessary? And whilst on the subject of Registrars, I'm sure they will see \$ signs in selling 'whois protect' type services.

So, whilst "thick" is OK in our minds, we don't see it as "essential".

To close, we feel it is important to the community, the continuing development of the Internet and to ensure no further loss of credibility, that nothing is put in the way of ensuring the very speediest opening of the

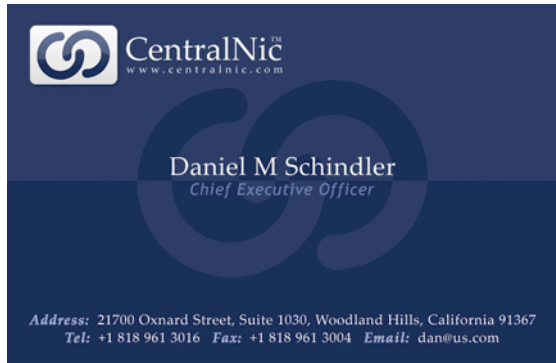
## CentralNic Draft IRT Comments

application window. If we wait for perfect solutions to issues we will never see new gTLDs, just like we would never have seen the Internet etc.

Assuring you of our very best intentions as always.

Regards,

Daniel Schindler



Global Domain Names

