



July 15, 2010

Peter Dengate Thrush, Chairman
Members of the Board of Directors
International Corporation for Assigned Names and Numbers
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

RE: Employ Media sTLD Proposed Charter Amendment

Dear Chairman Dengate Thrush and Members of the Board:

I am writing on behalf of JobTarget, LLC and JobTarget.com to urge you to reject Employ Media's request for authority to permit second-level registration of strings that do not correspond to an employer's name in the .jobs sponsored top-level domain ("sTLD"). JobTarget.com, which would be directly and adversely affected, opposes the unilateral expansion of the .jobs charter to encompass regional and industry-specific second-level registrations.

Under the terms of ICANN's request for proposals for new sTLDs dated December 15, 2003, applicants – including Employ Media - were required to demonstrate that the proposed sTLD addresses the needs and interests of a clearly defined community (the "Sponsored TLD Community"). In addition, applicants were required to demonstrate that the policy-formulation procedures for the sTLD (1) operate primarily in the interests of the Sponsored TLD Community, and (2) that the proposed sTLD enjoys broad based support of the Sponsored TLD Community.¹ Employ Media's current request meets neither of those requirements.

In its original application, Employ Media proposed to serve the needs of human resources professionals responsible for human resources management in the corporate setting, and pledged to maintain .jobs as "a name space for employers."² It also promised to limit registrations to the legal name of an employer and/or a name or abbreviation by which the employer is commonly known and to prohibit registration of occupational and industry, and geographic identifiers."³ Employ Media's current request for to permit the "registration, use, and promotions of domains that are not the company names of the registrant"⁴ would fundamentally and

¹ <http://www.icann.org/en/tlds/new-stld-rfp/new-stld-application-part-a-15dec03.htm>

² sTLD Applicant responses to request for further information, at page 48 of 177 <http://www.icann.org/en/tlds/stld-apps-19mar04/PostAppC.pdf>

³ *Id.*

⁴ <http://www.icann.org/en/registries/rsep/jobs-proposal-09jun10-en.pdf> (hereinafter, "Employ Media RSEP Request")



significantly alter the Sponsored TLD Community for the .jobs sTLD and violate Employ Media's pledge not to create second-level registrations of regional and industry-specific job boards.

Employ Media does not have the support of online employment service providers such as JobTarget.com to add second-level registrations that will be confusingly similar to established job boards. ICANN should not permit sTLD operators to circumvent the sponsorship eligibility requirements in the sTLD RFP and the protections built into the .jobs Registry Agreement that are designed to prevent "abusive registration activities and other activities that affect the legal rights of others."⁵

Approval of Employ Media's amendment to its original application would undermine the credibility of ICANN's commitments in connection with the introduction of new top-level domains in general and "community-based" TLDs in particular.

Sincerely,

Alison Mayo
Partner Services Manager
JobTarget

⁵ .jobs Registry Agreement, Appendix S Part VII: Other Provisions (2. "Community Value Criteria")