



John F. Sturm  
President and CEO

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: Opposition to Employ Media's Request to Change sTLD Charter*

Dear Chairman Dengate Thrush and Members of the Board:

The Newspaper Association of America (NAA) writes to express deep concern over Employ Media's proposed "Phased Allocation Program," which would provide it with the authority to permit second level registration of strings that do not correspond to an employer's name in the .jobs sponsored top-level domain.

NAA is a national trade association representing more than 2,000 newspapers. Most NAA members are daily newspapers accounting for nearly 90 percent of the daily circulation in the United States.

Newspapers have long served as leading providers of news and information to their local communities. This remains true in today's digital environment as newspaper websites are highly valued by consumers for their local content. According to recent research by comScore, on behalf of NAA, local newspaper websites rank on top of the list of all sources for credibility and trustworthiness – as well as being the most informative place for consumers to find local content of all types, including classified advertising content.

Local employment classifieds continues to be an important source of revenue for newspapers, particularly newspapers in small and medium markets. Therefore, NAA believes thousands of our member newspapers would be adversely affected by Employ Media's efforts to unilaterally expand the .jobs charter to encompass regional and industry-specific second-level registrations.

**Chairman Dengate Thrush and Members of the Board**  
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We respectfully urge ICANN to reject the Employ Media proposal for the following policy reasons:

First, we understand that under the terms of ICANN's request for proposals for new sTLDs dated 15 December 2003 (the "sTLD RFP"), 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 its 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." 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." NAA believes that Employ Media's current request to permit the "registration, use, and promotions of domains that are not the company names of the registrant" would fundamentally alter the Sponsored Community for the .jobs sTLD.

Second, we are concerned that Employ Media could switch its role from a charter holder into an active job board company and, by doing so, use its exclusive license to launch thousands of employment sites that would compete directly with newspapers and other employment sites. This could establish monopolistic conditions which could adversely impact the marketplace.

Finally, we believe that expansion of thousands of .jobs sites will marginalize the .jobs domain. This will have the effect of diminishing the effectiveness of employers' websites and reduce the ability to match the employer with highly skilled workers. In addition, the proliferation of thousands of sites is likely to add confusion and complexity to an individual job-seekers search. Further, without proper oversight over thousands of sites, individual job seekers could be subject to fraudulent or abusive practices (now prevalent in many free classified sites).

For the above mentioned reasons, NAA respectfully requests the ICANN Board to reject the request of Employ Media for approval of its Phased Allocation Program. Thanks for reading.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John F. Sturm". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John F. Sturm  
President and CEO