

**17 West Sixty-ninth Terrace
Kansas City, MO 64113**

July 14, 2010

Mr. 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
USA

RE: Opposition to Employ Media Request to Change sTLD Charter

Dear Chairman Dengate Thrush and Members of the Board:

I am writing on behalf of *Leadership USA, Inc.* a 501-c-3 association 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 for Leadership USA , 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 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 addition, applicants were required to demonstrate that the policy-formulation procedures for the sTLD operate primarily in the interests of the Sponsored TLD Community, and that the proposed sTLD enjoys broad based support of the Sponsored TLD Community.[1]

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." [2] The limited nature of the .jobs Sponsored Community is reflected by the applicant's commitment to limit registrations to the legal name of an employer and/or a name or abbreviation by which the employer is commonly known. According to the sTLD Application, "due to restrictions set forth in this proposal, a registration in the .jobs sTLD will be associated with an employer," [3] and Employ Media committed to prohibit registration of occupational and industry, and geographic identifiers." The bottom line is that as proposed by Employ Media and approved by ICANN, the .jobs sTLD is intended to serve HR professionals and recruiting firms representing direct employers only, in each case by using the legal name of such employers as a registration at the second level. That community does not include online employment services providers like our association nor did Employ Media demonstrate the support of online employment services providers in connection with the .jobs sTLD Application.

Employ Media's current request for authority to permit the "registration, use, and promotions of domains that are not the company names of the registrant"[5] would fundamentally alter the Sponsored Community for the .jobs sTLD and eliminate its pledge not to create second level registrations of regional and industry-specific job boards. Employ Media did not attempt to demonstrate the support of online employment services providers and their vendors, and in fact went out of its way to avoid contacting job board operators about the proposed expansion.[6] This is not surprising, given that Employ Media intends to add second level registrations that will be confusingly similar to established job boards.

As a material change to the .jobs Registry Agreement, this request must be reviewed by the ICANN Board based on applicable criteria from the sTLD RFP. Under those criteria, the request should be rejected as an attempt to "route around" the sponsorship eligibility requirements in the sTLD RFP and the protections built into the .jobs Registry Agreement to prevent "abusive registration activities and other activities that affect the legal rights of others." [7] Approval of the .jobs Phased Allocation Program would threaten the integrity of the RSEP process and undermine the credibility of ICANN's commitments in connection with the introduction of new top level domains in general.

Association are as financially challenged as anyone in this current economy, In seeking non-dues revenue, association based job boards represent one way to supplement non dues revenue by tying the needs of our membership to various employment opportunities they might not otherwise see in their normal work day. Instead of expanding employment opportunities for association members the proposed action will restrict such opportunities to such major job board providers, subjecting association membership to unwanted intrusions from others purchasing emails lists from such job boards to "hawk their wares" to association members. Keep the playing field fair, even, and minimize such unwanted actions, please!

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Maloney, Jr.", written in a cursive style.

James D. Maloney, Jr. CAE
Board Member
Leadership USA, Inc

Former Executive Director and CEO of CLA - the Community Leadership Association, Athens, GA

Former Executive Director and CEO of RCTIE – the Regional Consortium for Technology and Information Exchange, Kansas City, MO

Letter posted to US Mail July 15, 2010