



Environmental Bankers Association
510 King Street, Suite 410
Alexandria, VA 22314
703-549-0977 www.envirobank.org

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 Request to Change sTLD Charter

Dear Members of the Board:

EBA is a non-profit trade association that represents the financial services industry, including bank and non-bank financial institutions, insurers, asset management firms and those who provide services to them. The EBA has more than 300 members. The EBA was established in 1994 in response to heightened sensitivity to environmental risk issues, and the need for environmental risk management, sustainable development, and due diligence policies and procedures in financial institutions. Its members are not limited to financial institutions. Currently, our membership includes property & casualty insurers and brokers, environmental consultants, appraisers and environmental information management firms, and environmental, real estate and trust attorneys in addition to the financial sector across the United States and in nearly 50 countries around the world.

The EBA meets formally twice a year at a location hosted by one of its members. The meetings provide not only a forum to promote the exchange of environmental risk management and sustainable development lending information and technical expertise but also provides the opportunity for our members to network.

EBA's career center and the premier job board for our environmental professional. EBA's jobsite (<http://www.envirobank.org/careers.php>), began operating online in 2004, has been a success helping current members looking for jobs find new work through the Association. It has also allowed us to network and form partnership of job boards run by our current member's organization. It has also helped promote the association and generated new inquires and new prospective members.

On behalf of the Environmental Bankers Association, we want 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. Environmental Bankers Association hosts a job site on our web page, which would be directly and adversely affected, and therefore 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
