

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
USA

Also By Email to jobs-phased-allocation@icann.org

RE: Opposition to Proposal to Change .jobs sTLD Charter

Dear Chairman Dengate Thrush and Members of the Board:

CollegeRecruiter.com is the leading job board used by college students searching for internships and recent graduates hunting for entry-level jobs and other career opportunities. I founded this company almost two decades ago and it remains 100 percent owned and operated by my wife, Faith Rothberg, and me. We are a proud member of the International Association of Employment Web Sites and have been named a "top job board" four years in a row by WEDDLE's, the world's largest publisher of print guides to job boards and referred to as the "Zagat" of the online employment industry.

I have closely followed 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. Indeed, I recently became a member of the IAEWS task force on this issue. Should the change to the charter be approved by ICANN, CollegeRecruiter.com would be directly and adversely affected but even if it weren't, I would still vehemently oppose the unilateral expansion of the .jobs charter to encompass regional and industry-specific second-level registrations.

In its application for the .jobs charter, Employ Media proposed to serve the needs of corporate human resources professionals and pledged to maintain .jobs as "a name space for employers." I supported and continue to support that use of the .jobs extension even though Employ Media rejected an application that I filed for CollegeRecruiter.jobs because CollegeRecruiter.com is a

job board and did not plan to use CollegeRecruiter.jobs solely to promote our own job openings. While I was disappointed with their denial of my application, I wasn't troubled by it as they were merely enforcing the terms of the charter they had requested and were not attempting to create a playground in which only they would decide who could play. The rule applied to all and applied to all equally so I moved on. But when the same organization decided that it wanted to create that exclusive playground and potentially create a CollegeRecruiter.jobs site as one of the hundreds of thousands of job boards it wants to create, I knew that I needed to get involved to help ensure that the fair and reasonable rules in the .jobs charter continued to be enforced and not modified to the benefit of the few at the expense of the many.

The .jobs charter limits registrations to the legal name of an employer and/or a name or abbreviation by which the employer is commonly known. That community does not include job boards like CollegeRecruiter.com nor did Employ Media demonstrate the support of job boards or other members of the online employment services provider community in connection with the .jobs sTLD Application. In fact, Employ Media went out of its way to avoid contacting job board operators like me about the proposed expansion.

I urge the Board of Directors to review the Employ Media request for what it is: as a material change to the .jobs Registry Agreement which must be reviewed by the ICANN Board based on applicable criteria from the sTLD RFP.

Sincerely,



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