Daniel K. Shipp President



July 15, 2010

Peter Dengate Thrush, Chairman Members of the Board of Directors Internet Corporation for Assigned Names and Numbers 4676 Admiralty Way, Suite 330 Marina del Rey, CA 90292-6601 E-mail: jobs-phased-allocation@icann.org

## RE: Opposition to Employ Media Request to Change sTLD Charter

Dear Board Members:

The International Safety Equipment Association is a nonprofit organization for manufacturers of personal safety equipment for use in the workplace. Its member companies design, manufacture and market unique life-saving equipment that is used by workers around the world. As a specialized industry, it is important for these companies to target potential employees with the right training and product knowledge, and to serve this need ISEA sponsors the Safety Equipment Industry JobBase. This service, which is hosted on the association's Web site at <u>www.safetyequipment.org</u>, connects job seekers and companies who need their unique skills and commitment to worker safety and health.

On behalf of ISEA, I am writing 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. ISEA, which would be directly and adversely affected, opposes the unilateral expansion of the .jobs charter to encompass regional and industry-specific second-level registrations.

The details of our position mirror those of Boxwood Technologies and other sponsors of association job boards. They are thoroughly documented in statements from other petitioners, and I will not repeat them here. ISEA believes that the .jobs domain is correctly limited to use by direct employers and their recruiting firms, and that its extension will create a mass of industry-specific domains, controlled by a commercial enterprise, that will overwhelm membership-based employment services such as ours.

ISEA serves the safety equipment industry, and by extension millions of working men and women whose lives depend on personal protective technologies. The Safety Equipment Industry JobBase is an important component of our services, and we urge you not to endanger it – and other similar nonprofit organization-sponsored employment services, by accepting Employ Media's request for extension of its franchise.

Yours sincerely, Sumlety