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January 15, 2013

Mr. Fadi Chehade
President and Chief Executive Officer
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Ray, CA 90292-6601

Dear Mr. Chehade,

The Procter & Gamble Company (P&G) concurs with the Intellectual Property Owners Association's (IPO) Comments on ICANN's new generic top-level domain (gTLD) Trademark Clearinghouse "Strawman Solution."

P&G is one of the world's leading consumer products companies, providing products to approximately 4.6 billion people around the world and conducting operations in approximately 75 countries worldwide. The Company has one of the strongest portfolios of trusted, quality, leadership brands, including 25 billion dollar brands including Pampers®, Tide®, Crest®, Olay® and Gillette®. The internet provides a valuable communication portal for our brands with our consumers and we share the interest expressed by IPO in the responsible introduction of the new gTLDs.

As stated by IPO, the Strawman Solution does not include the Limited Preventative Registrations (LPR) mechanism which would allow trademark owners to register non-resolving second-level domains across multiple new gTLDs in a cost effective manner. The LPR is crucial for the protection of consumers and trademark owners against brand confusion and cybersquatting activity. The current Strawman Solution is inadequate for this purpose. We request that ICANN seriously consider the inclusion of the LPR into the Trademark Clearinghouse and its attendant rights protection mechanisms.

In addition, we urge ICANN to consider the modifications to the Trademark Claims Process as set forth in IPO's comments including adoption and expansion of the Enhanced Trademark Claims Service (ETCS) which comprises an unlimited Trademark Claims period, a Trademark Clearinghouse that may include any previously abused strings and a modified 30-day Notice period followed by a 60-day Sunrise period. These safeguards will provide brand owners with a workable post-registration enforcement process that allows for the legitimate and non-infringing use of domain names while providing adequate brand protections.

Thank you for the opportunity to provide comments on the Trademark Clearinghouse implementation.

Sincerely,

Ken K. Patel
Vice President, Associate General Counsel
Global Commerce