



September 16, 2010

Mr. Dennis Jennings, Chair
Ms. Rita Rodin
Mr. Raymond Plzak
Mr. Ram Mohan
Board of Directors Governance Committee
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, California 90292

Dear Mssrs. Jennings, Plzak, Mohan and Ms. Rodin:

I am writing on behalf of the Internet Commerce Coalition to express our views on the rollout of new gTLDs and to urge you to recommend that the ICANN Board of Directors reconsider its approval of Employ Media's plan to expand registrations in the .JOBS top level domain in violation of the .JOBS Charter.

The Internet Commerce Coalition includes leading Internet Service Providers, ecommerce sites and technology trade associations including Amazon.com, AT&T, Comcast, eBay, ITAA, Monster.com, Verizon, and the U.S. Telecom Association. The ICC works for reasonable regulation of technology that will allow ecommerce and communications technology to flourish. ICC member companies support private sector management and coordination of the domain name system, and several have been active participants in the ICANN process since its inception.

As large business users of the domain name system, we have been disappointed in ICANN's continued plans to expand the domain name space without the effective rights protection mechanisms that our members must have in order to protect their customers and their well known brands against fraud and abuse. The current set of mechanisms proposed by ICANN in its latest Draft Applicant Guidebook, including the Uniform Rapid Suspension System and Post Delegation Dispute Registration Procedure are neither expedited nor effective enough to prevent the widespread abuse of trademarks in the new gTLDs. Without adequate and effective remedies, our members expect to spend millions of dollars in unnecessary global enforcement costs to protect their brands. We urge you to support the idea of ICANN studying the costs new gTLDs impose on brand owners and take all necessary steps to improve upon the rights protection mechanisms before any rollout of new gTLDs.

Our concerns about the current process that ICANN has put in place are heightened by the Board's decision to permit the expansion of the .JOBS sponsored top level domain in violation of the .JOBS charter without appropriate process and due consideration for the rights of others. The proposed expansion of .JOBS reverses specific commitments offered by Employ Media in the application process that formed the basis for ICANN's approval and justified the omission of

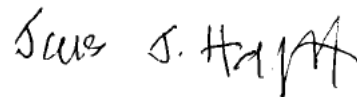
standard rights protection mechanisms at launch. Whatever the merits of the plan may be, it is a matter of great concern to the Internet Commerce Coalition that ICANN's consideration of Employ Media's Phased Allocation Program proceeded without adequate attention to the interests of affected stakeholders who, because they are not members of the sponsored community for .JOBS, have -- by definition and by Employ Media's admission -- not participated in the policy development process.

The Board's approval of the expansion was based on a cursory summary of public comments and . . . and that an independent review noted "failed to consider the serious concerns of hundreds of professional organizations."

As business users of the domain name system, we depend upon ICANN to hold registry operators to the commitments they have made to secure the opportunity to operate a top level domain, and we count on ICANN to ensure that material changes in those commitments receive appropriate review, taking into account the rights and interests of third parties who may be directly and adversely affected by such changes. We also expect ICANN to live up to its commitments to consider all overarching issues, including the protection of trademarks, before expanding the domain name space in an orderly, timely and predictable way.

These protections are critical to the integrity and predictability of expansion of the domain name space, and we hope that ICANN will cure this irregularity.

Sincerely,



James J. Halpert
General Counsel

cc: Rod Beckstrom, CEO
John Jeffrey, Esq.