

THE .JOBS CHARTER COMPLIANCE COALITION

Attention: John Bell
Chairman & CEO, Boxwood Technology
Executive Plaza III
11350 McCormick Road, Suite 101
Hunt Valley, MD 21031

July 8, 2011

VIA EMAIL

Mr. Stephen Crocker
Mr. Rod Beckstrom
Mr. John Jeffrey, Esq.
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601
USA

Re: Undisclosed Change Concerning .JOBS TLD “Purpose” in IANA’s Root Zone Database;
Information Request

Dear Messrs. Crocker, Beckstrom and Jeffrey:

The .JOBS Charter Compliance Coalition (the “Coalition”) submits this open letter to you regarding an *undisclosed and fundamental change* recently made to the designated “purpose” of the .JOBS Top-Level Domain (“TLD”) that is described in the Internet Assigned Numbers Authority’s (“IANA”) [Root Zone Database](#). IANA’s Root Zone Database claims to be *“the authoritative record”* regarding the technical and administrative details of the registry operators for various TLDs. As you know, IANA is operated by the Internet Corporation for Assigned Names and Numbers (“ICANN”).

IANA is responsible for maintaining the delegation details of registry operators, including .JOBS operator Employ Media, in the Root Zone Database. Part of the information maintained in the Root Zone Database includes a “Purpose” field, which in the case of sponsored TLDs, describes the limited community that the sponsored TLD is designated to serve. According to the IANA [website](#), *“TLD operators can change their delegation details”* in the IANA Root Zone Database by submitting a [TLD Modification Template](#). It appears that Employ Media may have recently utilized this process to change the description of the fundamental “purpose” of the .JOBS TLD in the IANA Root Zone Database.

Since the inception of the .JOBS TLD and up until a few weeks ago, the IANA Root Zone Database clearly stated that the limited “purpose” of the .JOBS TLD was *“[r]eserved for human resource managers.”* (Exhibit A). The Coalition emphasized this language in its [open letter](#) to John Jeffrey on May 11, 2011, confirming its position that the .JOBS Charter language clearly limits the class of persons eligible to register a second-level domain name in the .JOBS

TLD to those individuals who work in the human resource function within their respective companies and organizations.

It was therefore surprising – and revealing – when the Coalition discovered that Employ Media apparently made a recent, fundamental and non-transparent change to the “purpose” field of the .JOBS TLD in the IANA Root Zone Database. The “reserved for human resource managers” language that confirmed the restrictive parameters of the .JOBS Charter has been *replaced* with the following description: “[r]eserved to serve needs of the international human resource community.” (Exhibit B) The expansive language in this change was clearly fabricated *after* the Coalition’s May 11th letter, which cited the earlier restrictive language in support of its position. Simply put, Employ Media blatantly altered the .JOBS TLD “purpose” description in the IANA Root Zone Database because it directly refuted their position regarding the interpretation of the Charter. This last minute alteration is nothing less than an overt admission by Employ Media that it is in breach of the .JOBS Registry Agreement and Charter and that it must resort to underhanded tactics for support of its position.

The [mission statement](#) of IANA states that it is “responsible for the operational aspects of coordinating the Internet’s unique identifiers *and maintaining the trust of the community to provide these services in an unbiased, responsible and effective manner.*” Consistent with this mission and pursuant to ICANN’s Documentary Information Disclosure Policy (“DIDP”), the Coalition requests the following documents and information:

- (1) Any and all documents or communications relating to the original “Purpose” field description – *i.e.*, the “[r]eserved for human resource managers” language – for the .JOBS TLD in the IANA Root Zone Database. These documents or communications should include, but are not limited to, the designation template submitted by Employ Media to IANA on June 10, 2005, as described in the [“IANA Report on the Delegation of the .JOBS Top-Level Domain”](#) dated August 31, 2005.
- (2) Any and all documents or communications relating to the change(s) made in the IANA Root Zone Database relating to the “Purpose” field description for the .JOBS TLD.
- (3) Please provide an explanation or documents regarding the circumstances of the change(s) made in the IANA Root Zone Database relating to the “Purpose” field description for the .JOBS TLD, including but not limited to the following:
 - Which person or entity requested the change;
 - The date the change was requested;
 - The date(s) the change was reviewed and approved by IANA and/or ICANN;
 - The reason(s) given for requesting the change; and
 - The person(s) at IANA and/or ICANN responsible for reviewing and approving the change.

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The Coalition requests that (1) ICANN post this letter on the “Correspondence” page of its website and (2) the ICANN Secretary circulate this letter to the members of the ICANN Board of Directors. Thank you in advance for your response.

Sincerely,



John Bell
Chairman, .JOBS Charter Compliance Coalition

cc: ICANN Board of Directors
Maguy Serad
Eric Enson, Esq.
didp@icann.org

EXHIBIT A

LISTS OF TOP-LEVEL DOMAINS

As of August 19, 2010

Source: IANA (www.iana.org)

I. Generic Top-Level Domains (gTLDs)

<u>.BIZ</u>	generic-restricted	Restricted for Business NeuStar, Inc.
<u>.COM</u>	generic	Generic top-level domain VeriSign Global Registry Services
<u>.INFO</u>	generic	Generic top-level domain Afilias Limited
<u>.NAME</u>	generic-restricted	Reserved for individuals The Global Name Registry Ltd.
<u>.NET</u>	generic	Generic top-level domain VeriSign Global Registry Services
<u>.ORG</u>	generic	Generic top-level domain Public Interest Registry (PIR)
<u>.PRO</u>	generic-restricted	Restricted to credentialed professionals and related entities Registry Services Corporation dba RegistryPro

II. Sponsored Top-Level Domains

<u>.AERO</u>	sponsored	Reserved for members of the air-transport industry Societe Internationale de Telecommunications Aeronautique (SITA INC USA)
<u>.ASIA</u>	sponsored	Restricted to the Pan-Asia and Asia Pacific community DotAsia Organisation Ltd.
<u>.CAT</u>	sponsored	Reserved for the Catalan linguistic and cultural community Fundacio puntCAT
<u>.COOP</u>	sponsored	Reserved for cooperative associations DotCooperation LLC
<u>.EDU</u>	sponsored	Reserved for post-secondary institutions accredited by an agency on the U.S. Department of Education's list of Nationally Recognized Accrediting Agencies EDUCAUSE
<u>.GOV</u>	sponsored	Reserved exclusively for the United States Government General Services Administration Attn: QTDC, 2E08 (.gov Domain Registration)
<u>.INT</u>	sponsored	Used only for registering organizations established by international treaties between governments Internet Assigned Numbers Authority
<u>.JOBS</u>	sponsored	Reserved for human resource managers Employ Media LLC
<u>.MIL</u>	sponsored	Reserved exclusively for the United States Military DoD Network Information Center
<u>.MOBI</u>	sponsored	Reserved for consumers and providers of mobile products and services

EXHIBIT B



Internet Assigned Numbers Authority

Root Zone Database

The Root Zone Database represents the delegation details of top-level domains, including gTLDs such as ".COM", and country-code TLDs such as ".UK". As the manager of the DNS root zone, IANA is responsible for coordinating these delegations in accordance with its [policies and procedures](#).

Much of this data is also available via the WHOIS protocol at whois.iana.org.

Domain	Type	Purpose / Sponsoring Organisation
All A B C D E F G H I J K L M N O P Q R S T U V W X Y Z ccTLDs gTLDs IDNs		
.AC	country-code	Ascension Island Network Information Center (AC Domain Registry) c/o Cable and Wireless (Ascension Island)
.AD	country-code	Andorra Andorra Telecom
.AE	country-code	United Arab Emirates Telecommunication Regulatory Authority (TRA)
.AERO	sponsored	Reserved for members of the air-transport industry Societe Internationale de Telecommunications Aeronautique (SITA INC USA)
.AF	country-code	Afghanistan Ministry of Communications and IT
.AG	country-code	Antigua and Barbuda UHSA School of Medicine
.AI	country-code	Anguilla Government of Anguilla
.AL	country-code	Albania Electronic and Postal Communications Authority - AKEP
.AM	country-code	Armenia Internet Society
.AN	country-code	Netherlands Antilles (being phased out) University of The Netherlands Antilles
.AO	country-code	Angola Faculdade de Engenharia da Universidade Agostinho Neto
.AQ	country-code	Antarctica Mott and Associates
.AR	country-code	Argentina MRECIC (Ministerio de Relaciones Exteriores, Comercio Internacional y Culto)
.ARPA	infrastructure	Reserved exclusively to support operationally-critical infrastructural identifier spaces as advised by the Internet Architecture Board Internet Assigned Numbers Authority
.AS	country-code	American Samoa AS Domain Registry
.ASIA	sponsored	Restricted to the Pan-Asia and Asia Pacific community DotAsia Organisation Ltd.
.AT	country-code	Austria NIC AT Internet Verwaltungs und Betriebsgesellschaft m.b.H
.AU	country-code	Australia .au Domain Administration (auDA)

Domain	Type	Purpose / Sponsoring Organisation
<u>.JO</u>	country-code	Jordan National Information Technology Center (NITC)
<u>.JOBS</u>	sponsored	Reserved to serve needs of the international human resource management community Employ Media LLC
<u>.JP</u>	country-code	Japan Japan Registry Services Co., Ltd.
<u>.KE</u>	country-code	Kenya Kenya Network Information Center (KeNIC)
<u>.KG</u>	country-code	Kyrgyzstan AsialInfo Telecommunication Enterprise
<u>.KH</u>	country-code	Cambodia Ministry of Post and Telecommunications
<u>.KI</u>	country-code	Kiribati Ministry of Communications, Transport, and Tourism Development
<u>.KM</u>	country-code	Comoros Comores Telecom
<u>.KN</u>	country-code	Saint Kitts and Nevis Ministry of Finance, Sustainable Development Information & Technology
<u>.KP</u>	country-code	Korea, Democratic People's Republic of Star Joint Venture Company
<u>.KR</u>	country-code	Korea, Republic of Korea Internet & Security Agency (KISA)
<u>.KW</u>	country-code	Kuwait Ministry of Communications
<u>.KY</u>	country-code	Cayman Islands The Information and Communications Technology Authority
<u>.KZ</u>	country-code	Kazakhstan Association of IT Companies of Kazakhstan
<u>.LA</u>	country-code	Lao People's Democratic Republic Lao National Internet Committee (LANIC) Science Technology and Environment Agency
<u>.LB</u>	country-code	Lebanon American University of Beirut Computing and Networking Services
<u>.LC</u>	country-code	Saint Lucia University of Puerto Rico
<u>.LI</u>	country-code	Liechtenstein Hochschule Liechtenstein
<u>.LK</u>	country-code	Sri Lanka Council for Information Technology LK Domain Registrar
<u>.LR</u>	country-code	Liberia Data Technology Solutions, Inc.
<u>.LS</u>	country-code	Lesotho National University of Lesotho
<u>.LT</u>	country-code	Lithuania Kaunas University of Technology Information Technology Development Institute
<u>.LU</u>	country-code	Luxembourg RESTENA
<u>.LV</u>	country-code	Latvia University of Latvia Institute of Mathematics and Computer Science Department of Network Solutions (DNS)
<u>.LY</u>	country-code	Libyan Arab Jamahiriya General Post and Telecommunication Company
<u>.MA</u>	country-code	Morocco Agence Nationale de Réglementation des Télécommunications (ANRT)
<u>.MC</u>	country-code	Monaco Gouvernement de Monaco Direction des Communications Electroniques