



November 11, 2009

Craig Schwartz
Chief gTLD Registry Liaison
Internet Corporation for Assigned Names and Numbers
1875 I Street, NW, Suite 501
Washington, DC 20006

Re: Request for Fee Amendment

Dear Craig,

I am writing on behalf of Employ Media LLC which operates the .JOBS Top Level Domain (TLD) under an agreement with ICANN 5 May, 2005 (the Registry Agreement). This letter constitutes Employ Media's formal request to amend Sections 7.2(b) and 7.2(c) of the Registry Agreement, the fees it pays to ICANN.

Comments

Employ Media fees to ICANN are comprised of a \$10,000 fixed annual fee and a \$2 per unit, variable transaction fee.

If our proposed fee amendment is enacted, we anticipate that the .JOBS wholesale fee will become an average. We do not know today what this average is going to be. This is due to the fact that we are implementing new market strategies vs. a "one size fits all" approach. New market strategies are based upon consultation with our Sponsoring Organization, SHRM, and extensive outreach to members of the .JOBS community.

A 2007 SHRM research report concluded that 93% of organizations with a .jobs domain reported improvements in the effectiveness of recruitment advertising campaigns and made it easier for candidates to apply for a job. In cooperation with our Sponsoring Organization, our desire is to expand our market tests and new strategies in 2010 to potentially hundreds of thousands of names community wide. We can predict with certainty that the wholesale amount, on average, will be substantially less.

Since we cannot today accurately predict what we anticipate this average will be, our Fee Amendment proposal seeks to increase our annual fixed fee from \$10,000 to \$50,000 while lowering the per unit, transaction fee from \$2 to 25 cents. We are seeking the right balance while emphasizing our desire to not reduce the total amount of fees we pay to ICANN on an annual basis. By accepting this Fee Amendment request, at least two things will happen in 2010: 1) Our fees paid to ICANN will increase, and 2) the total number domains in the .JOBS TLD will increase. We feel this is the correct formula in

the spirit of our agreement, realizing that a total paid fee reduction to ICANN is not our goal in making this request.

The specific sections affected by this request are reproduced below with our proposed changes in red (deletes with strikethrough and additions with double underline):

Section 7.2(b)

(b) Fixed Registry-Level Fee. Commencing on the Effective Date, Registry Operator shall pay ICANN a quarterly Fixed Registry-Level Fee in an amount equal to ~~US\$2,500~~ US\$12,500 for each quarter during the twelve-month period ending June 30, 2006. Such fee is subject to increase on July 1 of each year thereafter in an amount established by ICANN's Board of Directors, but not to exceed a sum equal to 115% of the prior year's fee. One dollar (USD) of the Fixed Registry-Level Fee shall be waived for each dollar that the Registry-Level Transaction Fee exceeds US\$2,000,000 per annum.

Section 7.2(c)

(c) Registry-Level Transaction Fee. Commencing as of the Effective Date, Registry Operator shall pay ICANN a Registry-Level Transaction Fee in an amount equal to ~~US\$2.00~~ US\$0.25 for each annual increment of an initial or renewal domain name registration or for transferring a domain name registration from one ICANN-accredited registrar to another during the calendar quarter to which the Registry-Level Transaction Fee pertains. For purposes of this Section 7.2(c), a "domain name registration" shall include a domain name within the registry for the TLD, whether consisting of two or more (e.g., john.smith.name) levels, about which Registry Operator or an affiliate thereof maintains Registry Data.

The proposed change does not have any impact on the security or stability of the registry or the DNS, and the proposed changes do not impact the registry-registrar provisioning system or Whois.

Thank you again for your attention to this matter and we look forward to adopting the amendment as discussed herein.

Sincerely,

Ray Fassett
Vice President, Operations and Policy
.jobs

cc (by email attachment): Kurt Pritz and John Jeffrey