

**From:** <Olive>, Gretchen

**Date:** Wednesday, 26 March 2014 08:40

**To:** Stephen Crocker, Fadi Chehade, Cherine Mohsen Chalaby

**Cc:** "BRG ([outreach@brandregistrygroup.org](mailto:outreach@brandregistrygroup.org))",  
"[martinsutton@hsbc.com](mailto:martinsutton@hsbc.com)", "[cyrus.nmazi@icann.org](mailto:cyrus.nmazi@icann.org)",  
[newgtld@icann.org](mailto:newgtld@icann.org)

**Subject:** .Brand Letters of Support to Re-insert the Exclusive Registrar provision into Specification 13.

Dear Mr. Crocker, Mr. Chehade and Mr. Chalaby,

On March 14, 2014, I read with interest Cyrus Nmazi's blog post regarding proposed Specification 13. I applaud many of the revisions that were made to Specification 13 as a result of the Public Comment period, but I must also express deep disappointment and concern over ICANN's removal of the provision that would enable .Brand registry operators to work exclusively with trusted registrar partners. This change would introduce unnecessary security risks and is too significant of a structural change to long-planned .Brand registry operations to be made only two (2) weeks prior to a Board vote on the matter.

As the trusted new gTLD advisor to over 1/3 of all .Brand applicants in ICANN's 1<sup>st</sup> round, we have very clear visibility into what motivated companies to apply for .Brands and how they plan to operate them. It is critical for ICANN to understand that all the .Brand applicants (200+ strings) we work with intend to operate their gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize their applied-for gTLDs. The current draft of Specification 13 would prevent them from operating in this manner. As a result, this proposed change has caused significant questions about the benefits and feasibility of operating a .Brand registry at the highest executive levels of many of our clients.

Attached, I share letters we have received over the last couple of days from 48 of our clients, which articulate their concerns regarding the removal of the provision allowing for exclusive registrar partners from Specification 13. I am hopeful that this, coupled with the expressions of concerns and constructive suggestions you have received from the Brand Registry Group (BRG), will enable the New gTLD Program Committee of the ICANN Board to override the recommendation of ICANN staff and approve Specification 13 during the ICANN Singapore meeting with the previous provision allowing .Brand registry operators to have exclusive registrar partners re-inserted.

Thank you for your consideration of our client's concerns.

Best regards,  
Gretchen

Gretchen M. Olive  
Director, Policy & Industry Affairs



Websites: [www.cscglobal.com](http://www.cscglobal.com) , [www.cscglobal.co.uk](http://www.cscglobal.co.uk) ,  
[www.cscglobal.de](http://www.cscglobal.de) , [www.cscglobal.fr](http://www.cscglobal.fr)



**Kathryn Barrett Park**  
Senior Counsel  
Advertising and Brand  
Management

General Electric Company  
3135 Easton Turnpike  
Fairfield, CT 06828  
USA

T 203 373 2655  
F 203 373 2181  
kathryn.park@ge.com

March 25, 2014

**VIA ELECTRONIC MAIL AND UPS**

Mr. Fadi Chehade, President and CEO, ICANN  
Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
12025 Waterfront Drive  
Suite 300  
Los Angeles, CA 90094-2536

Re: *Change to Specification 13 Regarding Exclusive Registrar Model*

Dear Messrs. Chehade, Crocker, and Chalaby:

As recently reported by ICANN in its blog at <http://blog.icann.org/2014/03/summary-and-analysis-of-specification-13-public-comments/>, Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. One change of great concern to the Brand community and General Electric Company (“GE”) is that Specification 13, as currently drafted, no longer allows .Brand registry operators to designate exclusive, trusted registrar partners for their TLDs.

GE has applied for two .BRAND TLDs -- .GECOMPANY and the Chinese translation of .GECOMPANY. As noted in our applications, it is our intention to operate these TLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to the TLDs’ websites and recipients of e-mail that utilize our applied-for TLDs. The current draft of Specification 13 would prevent us from doing this, thereby subjecting domains within our TLDs to undue risk of domain hijacking and exponentially increasing the possibility of unauthorized registrations in our TLDs.

In ICANN’s summary of public comments on this issue, it is clear that the only opponents of the exclusive, trusted registrar model were some of the registrars themselves. Those registrars did not articulate a reason to use the open registrar model for .BRAND TLDs and, similarly, did not

Mr. Fadi Chehade, President and CEO, ICANN  
March 25, 2014  
Page 2

spell out a rationale for their opposition to the trusted registrar model. Rather, they claimed there was no need for an exemption from the open registrar model since brands can choose the registrar they want to deal with for the registration of domain names. As explained above, the need for the trusted exemption is clear. As recognized in the comment summary, numerous different entities (other registrars, not opposed, and various .BRAND gTLD applicants) made clear that there were numerous reasons for the allowance of a Brand to assign a single, trusted registrar to its TLD.

It makes no sense to force a .Brand registry to provide access to registry services to all registrars. By definition, there will be only one domain name customer – the registry. Clearly, and as the registrars pointed out in their comments, the registry-as-customer is free to decide which registrar(s) it will use to register its domain names in its .Brand TLD. Therefore, there is neither value nor utility in forcing the .Brand registry to provide access to registrars it will never do business with. Forcing the registry to provide access to registrars that will never legitimately register domain names in the TLD serves no purpose, and can only do harm to the registry, consumers, and the public, because it increases the chances that unauthorized parties would register in the .Brand TLD.

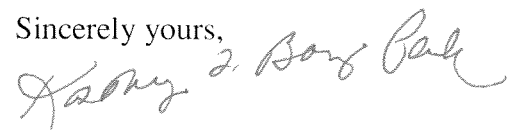
Brandowners will clearly promote their new .Brand TLD as a safe and secure place to do business with the brandowner – because every domain name in that TLD is controlled by the brandowner. Unauthorized third parties could use a domain name in a .Brand TLD to engage in phishing, malware exploits, data theft and other cybercrimes, and the consumer would have no reason to doubt the integrity of any contact with the cybercriminal – because they are using the TLD that the brandowner has assured them will only lead to its entity or enterprise. Such compromises will damage the value of the TLD and the brand itself, and, ultimately, it will damage the integrity of and trust of the public in the Internet.

To use a bricks and mortar analogy, if the TLD were a house, the owner would not hand out keys to individuals he did not want to invite inside, regardless of promises each might make that they would never enter his home. The .BRAND gTLD should be no different. The brandowner should not be actually forced to give access to a registrar that it will never allow to register domain names in the TLD.

Therefore, GE urges ICANN to re-insert the provision in proposed Specification 13 enabling .Brand registry operators to designate exclusive and trusted registrar partners for their TLDs, and for ICANN to do this prior to voting on Specification 13's approval.

Thank you for your consideration of this letter. If you have any questions or wish to discuss any of the points raised herein, please feel free to contact me at [kathryn.park@ge.com](mailto:kathryn.park@ge.com).

Sincerely yours,

Handwritten signature of Kathryn Z. Park in cursive script.

March 24, 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby – Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
U.S.A.

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:


It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a substantial change since it was initially posted on December 6, 2013 by ICANN for public comment. Our specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

The Northwestern Mutual Life Insurance Company's wholly owned subsidiary Northwestern Mutual Registry, LLC has applied for the gTLD .NORTHWESTERNMUTUAL. It is our intent to operate the gTLD in a tightly controlled, closed manner with only trusted registrar partners in order to ensure maximum security for visitors to websites and recipients of email that would use the gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to the risk of domain hijacking as well as the possibility of unauthorized registrations in our gTLD, which could cause significant reputational damage.

Northwestern Mutual urges that ICANN re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval.

Thank you for your attention to this matter.

Sincerely,



Brian L. Bock

Digital Marketing Manager

cc: Gretchen Olive, CSC Digital Brand Services (Gretchen.olive@cscglobal.com)

**Accenture**  
161 N. Clark St., 23rd Floor  
Chicago, Illinois 60601  
www.accenture.com

Kristen Poggensee  
Kristen.poggensee@accenture.com  
T 224.588.6334

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs. **Accenture** applied for the following gTLD - **<.ACCENTURE>**. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value. Therefore, **Accenture** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval.

If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services**, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

/kdp/

Kristen Poggensee  
Accenture

cc: Gretchen Olive, CSC Digital Brand Services (Gretchen.olive@cscglobal.com)



25, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Chrysler Group LLC applied for the following gTLDs - .chrysler, .jeep, .dodge, .ram, .srt, .uconnect and .mopar. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Chrysler Group LLC urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Sandschafer".

Scott Sandschafer  
Vice-President & Chief Information Officer  
Chrysler Group LLC

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

24, March 2014

Stephen Crocker - Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
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USA

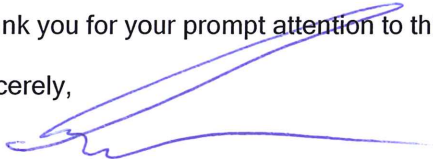
RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs. Aktiebolaget Electrolux applied for the following gTLDs - .aeg. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value. Therefore, Aktiebolaget Electrolux urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,



**Carl Wendt**  
Senior Trademark Attorney

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

AKTIEBOLAGET ELECTROLUX (PUBL)

MAILING ADDRESS  
105 45 STOCKHOLM

TELEPHONE  
+4687386000

WEBSITE  
[www.electrolux.com](http://www.electrolux.com)

VAT NO.  
SE663000098901

OFFICE ADDRESS  
S:T GÖRANSGATAN 143

TELEFAX  
+4687386813

REG. NO.  
556009-4178





24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Ally Financial Inc. applied for .ALLY. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Ally Financial Inc. urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Kouchinsky".

Kyle Kouchinsky  
Domain Manager

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



DISH Network L.L.C.  
P.O. Box 6663, Englewood, CO 80155-6663  
303.723-1000

March 24, 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Dear Messers Crocker, Chalaby and Chehade:

It has come to our attention that the current version of the proposed Specification 13 to the ICANN Standard Registry Agreement (“Specification 13”) no longer includes specific provisions of import to .Brand Registry Operators. These provisions were included in the Specification 13 version that was posted on the ICANN website for public comments on December 6, 2013. Specifically, we understand that Specification 13 will no longer permit a Registry Operator for a .Brand top level domain (“TLD”) to designate its preferred exclusive ICANN accredited registrar(s).

DISH DBS Corporation (“DISH”) applied for the following .Brand TLDs: .DISH, .OLLO and .BLOCKBUSTER. In applying for these .Brand TLDs, it has been DISH’s intention and desire to operate these .Brand TLDs in a very tightly-controlled and closed manner with only one or more trusted registrar partners. Our purpose for these .Brand TLDs is to: (i) provide maximum security for users of websites and e-mails that utilize our applied-for .Brand TLDs; and (ii) minimize the risk of domain hijacking, by reducing the possibility of unauthorized registrations in our .Brand TLDs, which could cause harm to our brands. The current draft of Specification 13 would prevent us from achieving the above goals, by denying DISH’s ability to select its preferred registrar(s) on an exclusive basis.

Therefore, DISH urges ICANN to immediately re-insert the provision permitting a “Registry Operator for a .Brand TLD to limit its registrar use to one or more preferred ICANN accredited

registrar(s)” into the current draft of Specification 13, prior to voting on the draft. If you have any questions about this request, please contact Deborah Lodge, Partner, Patton Boggs LLP at [dlodge@pattonboggs.com](mailto:dlodge@pattonboggs.com) or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

/John T. Kennedy/

John T. Kennedy, Esq.  
Acting Chief IP Counsel  
DISH Network L.L.C.

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

March 24, 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Oracle Corporation (“Oracle”) has applied for .ORACLE and .JAVA. Since application it has been our intention and desire to operate these gTLDs in a tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, and significantly increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage. This undermines the security promise of the new gTLDs, which was a core value proposition for us in determining whether to apply and how to operate these gTLDs.

Therefore, Oracle urges that ICANN re-insert the provision in proposed Specification 13, enabling qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you have questions regarding our position, please contact Tiki Dare, Managing Counsel, Oracle at [tiki.dare@oracle.com](mailto:tiki.dare@oracle.com), or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore, and at [gretchen.olive@cscglobal.com](mailto:gretchen.olive@cscglobal.com).

Thank you for your timely consideration.

Very Truly Yours,



Marilyn Tiki Dare  
Managing Counsel

cc: Gretchen Olive, CSC Digital Brand Services ([gretchen.olive@cscglobal.com](mailto:gretchen.olive@cscglobal.com))



24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
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**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLDs in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

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IG Group Holdings PLC applied for .nadex. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, IG Group Holdings PLC urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Fabrizio Ferraro, Deputy Head of Legal at IG Group Holdings PC ([Fabrizio.ferraro@ig.com](mailto:Fabrizio.ferraro@ig.com)) or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)), who are on-site at the ICANN Meeting in Singapore.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fabrizio Ferraro'.

FABRIZIO FERRARO  
DEPUTY HEAD OF LEGAL  
IG GROUP HOLDINGS PLC

**Strictly Private and Confidential**

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New  
gTLD Program Committee of the ICANN  
Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
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24, March 2014

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:


It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

UBS AG applied for the .ubs gTLDs. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant damage.

Therefore UBS AG urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact the signatory of this letter or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,



Richard Pakenham-Walsh

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
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It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

NATURA COSMÉTICOS S.A. applied for .NATURA. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, NATURA COSMÉTICOS S.A. urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Suyang Melo**, IP Manager for Natura Cosméticos S/A ([suyangmelo@natura.net](mailto:suyangmelo@natura.net)) or **Gretchen Olive**, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

Renata dos Santos de Campos

Intellectual Property Coordinator - Legal Department

NATURA COSMÉTICOS S/A

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

KERRY TRADING CO. LIMITED  
(Incorporated in Hong Kong)

31/F., Kerry Centre  
683 King's Road  
Quarry Bay, Hong Kong  
Tel: (852) 2525 7211  
Fax: (852) 2845 9000

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Kerry Trading Co. Limited** applied for the following gTLDs - **.kuokgroup, .kerryproperties, .kerrylogistics, .kerryhotels, .嘉里 and .嘉里大酒店**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Kerry Trading Co. Limited** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Ms. Amy Wong at (852) 2820 0418 or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,  
For and on behalf of  
Kerry Trading Co. Limited



cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))





SHANGRI-LA

HOTELS and RESORTS

Corporate Office

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Shangri-La International Hotel Management Limited applied for the following gTLDs - .shangrila, .tradershotels, .香格里拉 and .盛貿飯店. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Shangri-La International Hotel Management Limited** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Ms. Amy Wong at (852) 2820 0418 or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,  
For and on behalf of  
Shangri-La International Hotel Management Limited

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



24, March 2014

Stephen Crocker – Chair, ICANN Board  
CherineChalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
FadiChehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Australia and New Zealand Banking Group Limited (ANZ)** applied for the following gTLDs - **.anz**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **ANZ** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,

Wing Cheung  
Group Senior Manager, Group Marketing  
Australia and New Zealand Banking Group Limited

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby – Chair, ICANN New gTLD  
Program Committee of the ICANN Board  
Fadi Chehade – President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

Robert Bosch GmbH  
Postfach 10 60 50  
70049 Stuttgart  
Visitors:  
Robert-Bosch-Platz 1  
70839 Gerlingen-Schillerhöhe  
Tel 0711 811-0  
www.bosch.com

Ulrich Spieth, C/CCN2  
Tel +49(711)811-6962, Fax +49(711)811-5162766  
Ulrich.Spieth@de.bosch.com

25 March 2014

**Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade,

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Robert Bosch GmbH applied for the following gTLDs – .bosch and .rexroth. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs.

The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant damage to our brand and our business.

Therefore, Robert Bosch GmbH urges that ICANN re-inserts the provision in proposed Specification 13 which would enable qualified .Brand registry



operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

25 March 2014

Page 2 of 2

Yours sincerely

Robert Bosch GmbH  
C/CCN Christian Fronek

A handwritten signature in blue ink, appearing to read 'Christian Fronek', written over the printed name.

cc: Gretchen Olive, CSC Digital Brand Services  
([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

MetLife Services and Solutions, LLC  
1095 Avenue of the Americas  
New York, NY 10036  
212 578-2211

**MetLife**<sup>®</sup>

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

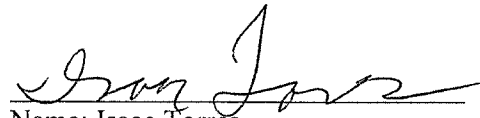
It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**MetLife Services and Solutions, LLC** (“**MetLife**”) applied for the .metlife gTLD. Since application, it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would subject domains under our gTLD to undue or additional risk of domain hijacking, and would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **MetLife** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Heidi Constantine Nelson ([hconstantine@metlife.com](mailto:hconstantine@metlife.com)) or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. Gretchen can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,



Name: Isaac Torres  
Title: Secretary  
MetLife Services and Solutions, LLC

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Linde Aktiengesellschaft** applied for the following gTLD **.Linde** . Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Linde Aktiengesellschaft** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,



Marcus Stegmiller  
eMedia Manager  
Corporate Communications & IR  
Linde AG  
Klosterhofstrasse 1, 80331 München, Germany  
Phone +498935757-1355, Mobile +491722887903  
[marcus.stegmiller@linde.com](mailto:marcus.stegmiller@linde.com)

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

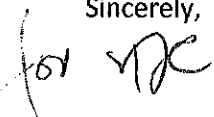
It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Rogers Communications Partnership** applied for the following gTLDs **.ROGERS** and **.FIDO**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Rogers Communications Partnership** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,



Catherine Douglas

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

Orange Brand  
Services Limited

The Point  
37 North Wharf Road  
London W2 1AG

[www.orange.com](http://www.orange.com)

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Orange Brand Services Limited** applied for the following gTLD: - **.ORANGE**. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Orange Brand Services Limited** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,

Debbie Marks, Legal Director

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Quest ION Limited applied for the following gTLDs - .Quest. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Quest ION Limited urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,



**Malcolm Chiu**  
Chief Information Officer  
QNet Limited

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of  
the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

25 March 2014  
Ref.: PPa/EHN

cc: Gretchen Olive, CSC Digital Brand Services  
([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

**Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

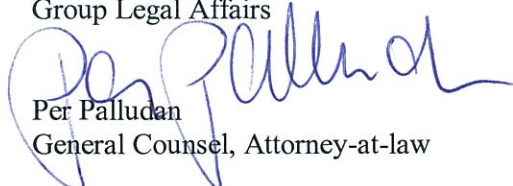
**ROCKWOOL International A/S** applied for the following gTLDs - <.ROCKWOOL>. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **ROCKWOOL International A/S** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Christina Bildsøe Møller, Senior Risk and Trademark Manager. She can be reached at [christina.bildsoe.moller@rockwool.com](mailto:christina.bildsoe.moller@rockwool.com).

Thank you for your prompt attention to this matter.

Sincerely,

**ROCKWOOL International A/S**  
Group Legal Affairs

  
Per Palludan  
General Counsel, Attorney-at-law

Phone: +45 46 56 03 00  
Fax: +45 46 56 33 11  
Internet: [www.rockwool.com](http://www.rockwool.com)  
Danish CVR no: 54879415



24, March 2014

Stephen Crocker – Chair, ICANN Board

Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board

Fadi Chehade - President & CEO, ICANN

12025 Waterfront Drive, Suite 300

Los Angeles, CA 90094-2536

USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**SEEK Limited** applied for the following gTLDs - **.seek**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Seek Limited** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact

**Gretchen Olive,**

**Director of Policy & Industry Affairs for CSC Digital Brand Services,**  
**who is on-site at the ICANN Meeting in Singapore. She can be reached at**  
**[Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)>.**

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gretchen Olive', with a horizontal line underneath.

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

---

**SEEK Limited**

Level 6, 541 St Kilda Road, Melbourne, Victoria, 3004 | Tel: 03 8517 4100 | Fax: 03 9510 7244 | ABN 46 080 075 314

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

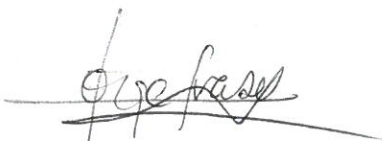
It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Sener Ingeniería y Sistemas** applied for the following gTLD **.sener**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Sener Ingeniería y Sistemas** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gretchen Olive", with a horizontal line underneath.

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Seven West Media Ltd** applied for the following gTLDs - **.seven**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Seven West Media Ltd** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,



Jeff Beech,  
Regulatory Affairs  
Seven West Media Ltd

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



24 March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Sky IP International Limited applied for the .sky gTLD. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilise .sky. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorised registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore Sky IP International Limited urges ICANN immediately to re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact [Celia Pendery at celia.pendery@skyinternational.ch](mailto:celia.pendery@skyinternational.ch) or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

  
MICHAEL CHRISTODOULOU

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

**Sky IP International Ltd**  
**Isleworth, Zweigniederlassung Zug**  
Dammstrasse 19, CH-6301 Zug, Switzerland  
Company number: CHE-115.771.058, VAT number: CHE-115.771.058 TVA  
☎ +41 (0)41 723 2600 – Fax +41 (0)41 723 2300



701 Brooks Avenue South  
 Thief River Falls, MN 56701 USA  
 toll-free: 800.344.4539  
 local: 218.681.6674  
 fax: 218.681.3380  
[www.digikey.com](http://www.digikey.com)

March 24, 2014

Stephen Crocker – Chair, ICANN Board  
 Cherine Chababy - Chair, ICANN New gTLD Program Committee of the ICANN Board  
 Fadi Chehade - President & CEO, ICANN  
 12025 Waterfront Drive, Suite 300  
 Los Angeles, CA 90094-2536

**RE: Support for re-insertion of RE: The ability of a Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chababy and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of Brand registry operators to designate exclusive registrar partners for their gTLDs.

Digi-Key Corporation applied for DIGIKEY Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Digi-Key Corporation urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)

Thank you for your prompt attention to this matter.

Sincerely,

Tony Harris, Chief Marketing Officer—Digi-Key Corporation

cc: Gretchen Olive, CSC Digital Brand Services (Gretchen.olive@cscglobal.com)



1919 North Lynn Street  
Arlington, VA 22209  
United States  
Tel: +1-571-303-3000  
Fax: +1-571-303-3100

24 March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

The Corporate Executive Board Company (CEB) applied for the gTLD .CEB. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, CEB urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

Matt Stevens  
Head of Digital Marketing, CEB

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))





**Christopher J. Hayes**  
Assistant General Counsel-  
Intellectual Property

**Emerson**  
8000 West Florissant Avenue  
P.O. Box 4100  
St. Louis, MO 63136-8506

T 314 553 2828  
F 314 553 3713  
Chris.Hayes@Emerson.com

March 25, 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade – President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Emerson Electric Co. (“Emerson”) applied for the .EMERSON gTLD. It has always been Emerson’s intention and desire to operate the gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD, which could cause significant reputational damage and reduction in shareholder value.

Therefore, Emerson urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. The current draft of Specification 13 is a material deviation from the version of the proposed Specification 13 that was initially posted on December 6, 2013, and significantly impairs the perceived value of the applied-for gTLD to Emerson. Emerson reserves all rights in the event that the current draft of Specification 13 is approved in connection with the ICANN Standard Registry Agreement. Should you have any questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

**PRINT ON COMPANY LETTERHEAD**

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**H. Lundbeck A/S** applied for the following gTLDs - **.Lundbeck**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **H. Lundbeck A/S** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).**

Thank you for your prompt attention to this matter.

Sincerely,



Oliver Sandorff

Head of Section, Lundbeck IT Web Development

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

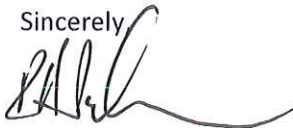
It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Next PLC applied for the following gTLDs - .next, .nextdirect and .lipsy. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Next PLC urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely



**Richard A Palmer**  
Head of Online Development  
Next PLC

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Sanofi** applied for the following gTLD - **.sanofi**. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Sanofi** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).**

Thank you for your prompt attention to this matter.  
Sincerely,

A handwritten signature in black ink that reads "Carole Tricoire". The signature is written in a cursive, flowing style.

Carole TRICOIRE  
Legal Director, Trademark

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

## The Weir Group PLC

20 Waterloo Street  
Glasgow  
G2 6DB  
Scotland

Tel: +44(0)141 637 7111  
Fax: +44(0)141 221 9789  
<http://www.weir.co.uk>

From the office of:  
**Jak Deschner**  
Direct line: +44 (0)141 308 3747  
[Jak.Deschner@weir.co.uk](mailto:Jak.Deschner@weir.co.uk)

Excellent  
Engineering  
Solutions



Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby – Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade – President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA  
24<sup>th</sup> March 2014

Dear Mr. Crocker, Mr. Chalaby and Mr. Chehade,

### **RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Weir Group IP Ltd. applied for the following gTLDs – .WEIR and .WARMAN. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Weir Group urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read "JD", followed by a horizontal line.

Jak Deschner  
Global IT Infrastructure & Operations Manager

Registered in Scotland:  
Number 2934

Registered Office:  
20 Waterloo Street,  
Glasgow G2 6DB  
Scotland



LAURENT FRADIN  
T +33 567190211  
F  
E Laurent.Fradin@airbus.com  
Our Reference:  
Your Reference:

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program  
Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN

12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

24 March 2014

RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement

Mr. Crocker, Mr. Chalaby and Mr. Chehade,

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Airbus S.A.S.** applied for the following gTLD - **.airbus**. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Airbus S.A.S.** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).**

Thank you for your prompt attention to this matter.

Sincerely,



Laurent FRADIN  
Head of Digital Communication

CC: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

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The logo for ARTE, consisting of the word "arte" in a bold, lowercase, sans-serif font. The letters are red, with the 'a' and 'e' having a slightly rounded, modern feel. The background of the entire document features a woman in a red dress standing in a forest, with a large white envelope graphic overlaid on the left side.

ARTE G.E.I.E.  
4 QUAI DU CHANOINE WINTERER  
T +33 (0)388 14 22 22  
F +33 (0)388 14 22 00  
CS 20035

67080 STRASBOURG CEDEX

POSTFACH 1980  
77679 KEHL

24, March 2014

**Stephen Crocker** – Chair, ICANN Board  
**Cherine Chalaby** - Chair, ICANN New gTLD  
Program Committee of the ICANN Board  
**Fadi Chehade** - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Association Relative à la Télévision Européenne G.E.I.E.** applied for the following gTLD - **.arte**. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Association Relative à la Télévision Européenne G.E.I.E.** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore.** She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Axel Bussek". The signature is fluid and somewhat stylized, with a long horizontal stroke at the end.

Axel BUSSEK

Legal Director

cc: *Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))*

[WWW.ARTE.TV](http://WWW.ARTE.TV)



BLANCO GmbH + Co KG  
Flehinger Strasse 59  
75038 Oberderdingen  
GERMANY

P.O.Box 1160  
75032 Oberderdingen  
GERMANY

Telephone +49 7045 44-81100  
Telefax +49 7045 44-81299  
www.blanco.de

Marketing Communication  
Kerstin Arzt  
Telephone +49 7045 44-81153  
Telefax +49 7045 44-81195  
Kerstin.arzt@blanco.de

24.03.2014

BLANCO GmbH + Co KG • Flehinger Straße 59 • 75038 Oberderdingen

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD  
Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**BLANCO GmbH + Co KG** applied for the following gTLDs - **.blanco**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.



Therefore, **BLANCO GmbH + Co KG** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

BLANCO GmbH + Co KG



i.V. Kerstin Arzt

Marketing Communications Manager

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



**Boehringer  
Ingelheim**

Boehringer Ingelheim International GmbH · 55216 Ingelheim am Rhein

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD  
Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**Boehringer Ingelheim  
International GmbH**

24 March 2014

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Your reference  
Domains/Ly/ps

Phone +49 6132 77-8969  
Fax +49 6132 77-9551

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

Binger Strasse 173  
55216 Ingelheim am Rhein  
Germany  
Phone +49 6132 77-0  
Fax +49 6132 72-0  
[www.boehringer-ingelheim.com](http://www.boehringer-ingelheim.com)

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Boehringer Ingelheim International GmbH** applied for the following gTLDs - **.boehringer**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Board  
Prof. Dr Dr Andreas Barner  
Dr Wolfgang Baiker  
Hubertus von Baumbach  
Dr Joachim Hasenmaier  
Allan Hillgrove

Therefore, **Boehringer Ingelheim International GmbH** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Registered Office  
Ingelheim am Rhein  
Commercial Register Mainz  
HR B 21063

Deutsche Bank AG  
BIC: DEUTDE5MXXX  
IBAN:  
DE72 5507 0040 0012 2580 00

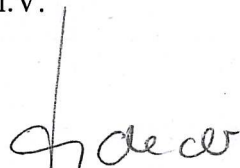
Thank you for your prompt attention to this matter.

Sincerely,

Boehringer Ingelheim International GmbH  
ppa. i.V.



Maximilian Kammler



Petra Leyendecker

cc: Gretchen Olive, CSC Digital Brand Services  
(Gretchen.olive@cscglobal.com)

24, March 2014

Stephen Crocker - Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade,

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Club Méditerranée S.A.** applied for the following gTLD - **.clubmed**. Since application it has been our intention and desire to operate these gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Club Méditerranée S.A.** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).**

Thank you for your prompt attention to this matter.

Sincerely,

Mathilde LAMAZÈRE  
Internet & CRM Director



cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



Stephen Crocker, Chair, ICANN Board  
Cherine Chalaby, Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade, President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

24 March 2014

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Dear Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**KONE Corporation** applied for the **.kone** gTLD. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD.

The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value. Should the current draft prevail, it would force KONE Corporation to re-evaluate whether we can use the .kone gTLD at all.

Therefore, we urge ICANN to re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

Johannes Frände  
Senior Legal Counsel  
KONE Corporation

KONE Corporation  
Johannes Frände  
Senior Legal Counsel  
Keilasatama 3  
02150 Espoo  
Finland  
Tel +358 204 75 4355  
Mobile +358 50 341 6767  
Fax +358 204 75 4523  
[johannes.frände@kone.com](mailto:johannes.frände@kone.com)  
[www.kone.com](http://www.kone.com)

Registered office:  
Kartanontie 1,  
00330 Helsinki, Finland  
Domicile:  
Helsinki, Finland  
Business Identity Code:  
1927400-1

**Group Corporate Communications**

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program  
Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

Name	Internal and Online Com. Katrin Fröhlich
Telefon	+49 (0)201 - 12 15 297
Telefax	+49 (0)201 - 12 15 143
E-Mail	katrin.froehlich@rwe.com

24 March 2014

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**RWE AG** applied for the following gTLD - **.rwe**. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **RWE AG** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

*i.A. Katrin Fröhlich***VORWEG GEHEN****RWE Aktiengesellschaft**Opernplatz 1  
45128 EssenT +49 201 12-00  
F +49 201 12-15199  
I [www.rwe.com](http://www.rwe.com)Vorsitzender des Aufsichtsrates:  
Dr. Manfred SchneiderVorstand:  
Peter Terium (Vorsitzender)  
Dr. Rolf Martin Schmitz  
(Stellvertretender Vorsitzender)  
Dr. Bernhard Günther  
Uwe TiggesSitz der Gesellschaft: Essen  
Eingetragen beim  
Amtsgericht Essen  
Handelsregister-Nr.  
HRB 14 525



24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Tata Motors Ltd** applied for the following gTLD - **.tatamotors**. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Tata Motors Ltd** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).**

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jagdish Belwal', written over a horizontal line.

Jagdish Belwal 24/3/14  
Chief Information Officer

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

**TATA MOTORS LIMITED**

4th Floor One Forbes 1 Dr V B Gandhi Marg Mumbai 400 001  
Tel 91 22 6615 8400 Fax 91 22 6615 8686 [www.tatamotors.com](http://www.tatamotors.com)  
Registered Office Bombay House 24 Homi Mody Street Mumbai 400 001

DIRECTION DE LA COMMUNICATION

2, Place aux Etoiles – CS 70001- 93633 La Plaine St Denis cedex



24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade,

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Société Nationale des Chemins de fer Français (SNCF) applied for the following gTLD - .sncf. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Société Nationale des Chemins de fer Français (SNCF) urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact *Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services*, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

Anne Philippot  
Directrice de la Marque SNCF

A handwritten signature in black ink, appearing to be 'Anne Philippot', is written over a horizontal line. The signature is stylized and cursive.

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



# The Goodyear Tire & Rubber Company

Akron, Ohio 44316-0001

24 March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

The Goodyear Tire & Rubber Company (“Goodyear”) applied for the gTLDs “.Goodyear” and “.Dunlop”. Since application, it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Goodyear urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive**, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,



Nicholas J. Valenziano, Jr.  
Senior Legal Counsel - Intellectual Property

cc: Gretchen Olive

The Estée Lauder Companies Inc.  
767 Fifth Avenue  
New York • NY • 10153  
212 • 572 • 4200

March 24, 2014

ESTÉE  
LAUDER  
COMPANIES

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Three of our subsidiary companies applied for .Brand gTLD's through our online division ELC Online Inc.:

- 1) **Origins Natural Resources Inc.** applied for .origins
- 2) **La Mer Technology Inc.** applied for .lamer
- 3) **Clinique Laboratories LLC** applied for .clinique

Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, The Estee Lauder Companies Inc. and its subsidiaries urge that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).**

Thank you for your prompt attention to this matter.

Sincerely,



Donna M. Ruggiero  
Associate Counsel

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

The current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Banco Bilbao Vizcaya Argentaria, S.A. (BBVA) (also founder member of the Brand Registry Group – BRG)** applied for **.bbva**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

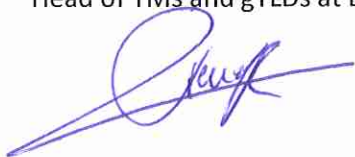
Therefore, Banco Bilbao Vizcaya Argentaria, S.A. urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact Irene Rodríguez Alonso or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,

Irene Rodríguez Alonso

Head of TMs and gTLDs at BBVA



cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



25 March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program  
Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536 USA

Dear Mr Crocker, Mr Chalaby and Mr Chehade

**Support for ability of a <.Brand> registry operator to designate an exclusive registrar for its gTLD(s)  
ICANN Standard Registry Agreement, Specification 13**

I understand that the current proposed Specification 13 to the ICANN Standard Registry Agreement has changed since it was initially posted by ICANN on 6 December 2013 for Public Comment.

Telstra Corporation Limited applied for <.yellowpages> and is currently in the contracting phase. Telstra's intention is to operate this gTLD in a controlled, closed manner with only designated exclusive registrar partners. The current draft of Specification 13 would prevent us from doing this.

Telstra requests that ICANN, prior to voting on its approval, re-inserts the provision in proposed Specification 13 which would enable qualified <.Brand> registry operators to designate exclusive registrar partners for their gTLDs.

If you have questions about the rationale for our position, please contact me. Alternatively, you may prefer to contact Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Yours sincerely

A handwritten signature in blue ink, reading 'Nadine Courmadias', is located below the 'Yours sincerely' text.

**Nadine Courmadias**  
**Legal Counsel, Intellectual Property**

Telstra Corporation Ltd  
38/242 Exhibition Street  
Melbourne VIC Australia 3000  
phone: +61 3 8697 1979  
[nadine.courmadias@team.telstra.com](mailto:nadine.courmadias@team.telstra.com)

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))

March 25, 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

Dear Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

Teachers Insurance and Annuity Association of America applied for the following gTLD - .TIAA. Since application it has been our intention and desire to operate this gTLD in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLD. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLD to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, Teachers Insurance and Annuity Association of America urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact myself or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com).

Thank you for your prompt attention to this matter.

Sincerely,



Robert Cattani

Legal Department  
55 Glenlake Parkway  
Atlanta, GA 30328  
(404) 828-6022 Tel  
(404) 828-6912 Fax



March 24, 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN

12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

United Parcel Service of America, Inc. on behalf of UPS Market Driver, Inc. applied for the following gTLD - .UPS . Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, United Parcel Service of America, Inc. on behalf of UPS Market Driver, Inc., urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James Harris".

James Harris, Attorney

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



Visa International Service Association  
P.O. Box 8999  
San Francisco, CA 94128-8999  
U.S.A.

25, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Visa Worldwide PTE. Limited** applied for the following gTLDs - **.visa**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Visa Worldwide PTE. Limited** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Sincerely,

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))



Level 2, 509 St Kilda Road  
Melbourne, Victoria, 3004  
Australia

Telephone: +61 3 9820 9214  
Facsimile: +61 3 9820 9258  
Email: [webjet@webjet.com.au](mailto:webjet@webjet.com.au)  
ASX code: WEB

24, March 2014

Stephen Crocker – Chair, ICANN Board  
Cherine Chalaby - Chair, ICANN New gTLD Program Committee of the ICANN Board  
Fadi Chehade - President & CEO, ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536  
USA

**RE: Support for re-insertion of the ability of a .Brand registry operator to designate exclusive registrars for their gTLD(s) in Specification 13 of the ICANN Standard Registry Agreement**

Mr. Crocker, Mr. Chalaby and Mr. Chehade:

It has come to our attention that the current proposed Specification 13 to the ICANN Standard Registry Agreement has undergone a very substantial change since it was initially posted on December 6, 2013 by ICANN for Public Comment. The change that is of specific concern relates to the ability of .Brand registry operators to designate exclusive registrar partners for their gTLDs.

**Webjet Limited** applied for the following gTLD - **.Webjet**. Since application it has been our intention and desire to operate these gTLDs in a very tightly-controlled, closed manner with only trusted registrar partners to ensure maximum security for visitors to websites and recipients of e-mail that utilize our applied-for gTLDs. The current draft of Specification 13 would prevent us from doing this and would subject domains under our gTLDs to undue risk of domain hijacking, would exponentially increase the possibility of unauthorized registrations in our gTLD that could cause significant reputational damage and/or reduction in shareholder value.

Therefore, **Webjet** urges that ICANN immediately re-insert the provision in proposed Specification 13 which would enable qualified .Brand registry operators to designate exclusive registrar partners for their gTLDs prior to voting on its approval. If you should have questions about the rationale for our position, please contact **the writer or Gretchen Olive, Director of Policy & Industry Affairs for CSC Digital Brand Services, who is on-site at the ICANN Meeting in Singapore. She can be reached at [Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com)**.

Thank you for your prompt attention to this matter.

Yours faithfully,

**Michael Sheehy**  
Chief Finance Officer

cc: Gretchen Olive, CSC Digital Brand Services ([Gretchen.olive@cscglobal.com](mailto:Gretchen.olive@cscglobal.com))