



**International Trademark Association**  
*Representing Trademark Owners Since 1878*

**Alan C. Drewsen**  
*Executive Director*

December 2, 2010

Mr. Peter Dengate Thrush  
Chairman of the Board of Directors  
Internet Corporation for Assigned Names and Numbers  
4676 Admiralty Way, Suite 330  
Marina del Rey, CA 90292-6601  
United States of America

Dear Mr. Dengate Thrush,

Thank you for your letter of October 27, 2010, welcoming the support of the International Trademark Association (INTA) in informing the economic analysis being undertaken regarding the introduction of new gTLDs. INTA welcomes the opportunity to further contribute to the development of ICANN's new gTLD program so that any introduction of new gTLDs advances the public interest as set forth in ICANN's Affirmation of Commitments.

It is within this spirit of constructive cooperation that INTA approaches the current issue of ensuring the new gTLD program is based on a solid economic foundation supported by independent market analysis and empirical research. As you may be aware, following the receipt of your letter, INTA representatives had a preliminary discussion with your economic advisor, Theresa Sullivan, on Friday, October 29, to become familiar with the project work underway, to provide guidance on how to best structure future research and study, and to help identify and offer access to resources for obtaining the data necessary to assess the public costs of introducing new gTLDs.

We believed this initial conversation was helpful in learning more about the project work already underway, and appreciate Ms. Sullivan's receptiveness. However, we are disappointed that, following this initial discussion with Ms. Sullivan, we have had no further substantive discussions with your staff or the economists. In light of the expedited timeframe mentioned in your letter of October 27, we are concerned that Phase II of the economic analysis is likely to be released within days of—or even after—the Board votes on approval of the Applicant Guidebook, and that no further collaboration with INTA is envisioned.

We hope that is not the case, and while we intend to review and comment on any related materials published in the near future, we are writing to reiterate our interest in working more closely with ICANN to get at the underlying questions that need to be answered: what is the level of organic demand for new top-level domain registries, what are the costs—to trademark owners and in the form of consumer confusion, among other costs—of introducing new gTLDs, and whether the potential benefits outweigh those costs. We believe these determinations should guide the scale, structure, and pace of introducing any new gTLDs to ensure the global public interest is advanced.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan C. Drewsen", written in a cursive style.