

July 31, 2012

Mr. Sébastien Bachollet
Chair, Public Participation Committee of the Board
International Corporation of Assigned Names and Numbers

Dear Mr. Sébastien Bachollet,

Our company, Brights Consulting Inc., would like to make an official request regarding the languages that ICANN employs for its official communications. We would like to appeal that ICANN included the Japanese language as the 7th one it uses for translation and interpretation.

Brights Consulting is an intellectual property consultancy with its headquarters in Tokyo, Japan. We represent over 400 corporate clients, most of whom are multinational corporations originating from Japan. To date, we assisted the application process for 19 Japanese new gTLD applicants (22 strings) in their efforts to secure a .brand TLD.

Please note that Japan currently has the largest number of applications in Asia and is the second after USA by number of “pure” applications from a country. In total, there are 71 ASCII applications from Japan, for generic, community, geographic, and brand terms.

Japanese applications are uniquely homogeneous and very diverse. Every single application from Japan is represented by an organization or company within Japan. For comparison, out of 85 applications from Luxembourg, 76 are made by an American company. British Virgin Islands have 70 applications by an American company out of 72. A close look to the landscape of applications by country will show that the situation repeats - the cases of Switzerland or Ireland, for instance, are the same. Thus, if we calculate the number of “pure” applications from each country, US will be the first, followed by Japan and Germany. Furthermore, in case of the applications from Japan, there are no monopolistic trends with a single company trying to secure a large number of TLDs for e-commerce. In this sense, it

is different to, for example, 91 applications from Cayman Islands that have 54 ones coming from one company.

Japan, thus, is willingly embracing new trends such as new gTLDs. With its vibrant Internet community of over 100 million Internet users (top 4 in the world) its potential in Internet industry is huge. The Japanese Internet community would benefit greatly from the Japanese language being among the languages of written and oral materials of ICANN. Adding Japanese language would also connect to the growth and diversification of the Internet in general.

Importantly, English is not widely spoken as a second language in Japan (as, for instance, in Europe), thus availability of materials in Japanese is crucial and could, for the first time, truly promote the understanding of ICANN mission and its initiatives. It would also increase participation rate of Japanese Internet community representatives and new gTLD applicants in the ICANN meetings.

Finally, we believe that if the explanatory materials about IDNs were available in Japanese as a part of a more active communications campaign, we would have witnessed a number of applications for generic IDNs from Japan. Please note that currently, there are no Japanese IDNs by a Japanese company/organization and the IDNs in Japan are applied for by the American companies, who are by far more well-versed in the matter due to the availability of all the materials in their native language.

We hereby conclude our request and will greatly appreciate your kind consideration. Brights Consulting Inc. is willing to assist ICANN in working out the strategy related to the implementation of the Japanese language as an additional official language.

Yours Sincerely,
Brights Consulting Inc.