



redefining / standards

Dr. David Crocker, Chairman of the Board
Mr. Fadi Chehade, President & CEO
Mr. Cherine Chalaby, Chair of the New gTLD Committee
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

March 4, 2013

Re: Comment on "Closed Generic" gTLD Applications

Dear Sirs,

AXA is one of the world's leading insurance and asset management groups, serving 101 million clients, individuals and businesses in 57 countries. AXA's global strategy and business model is based on three lines of expertise: property-casualty insurance, life & savings, and asset management. Building a culture of trust and achievement in an increasingly volatile and dynamic world has allowed AXA to provide its customers with more peace of mind. AXA works to protect its customers, their relatives, and their property against risks over the long term through delivering segmented and compelling solutions to answer customers' needs.

AXA is extremely concerned about the "closed generic" gTLD applications for at least three reasons – harm to the public, anti-competitive effects and circumvention of ICANN's own Code of Conduct and New Registry Agreement.

First, closed generic gTLDs harm the public. The Internet thrives on openness and freedom of choice. By allowing closed generic gTLDs, the Internet will change from its fluid, open form to an assortment of "walled gardens." Consumers do not benefit from walled gardens because when consumers search the Internet for various items, they want choices and not just the product or service of a single company.

Next, closed generic gTLDs have anti-competitive effects. Applicants of these gTLDs will be positioned to gain an unfair advantage in direct navigation and online searching. They will become associated with the very genus of products they offer and will likely control their gTLDs perpetually. This also presents steep barriers to entry for would-be competitors and allows existing dominant market players to reinforce their market position to the detriment of competition.

Finally, closed generic gTLDs circumvent ICANN's own Code of Conduct and New Registry Agreement. Specifically, ICANN's Code of Conduct and New Registry Agreement dictate that registries may not register the domain names in their own right and that registries must provide non-discriminatory access to Registry Services to all ICANN accredited registrars. Here, applicants would register domain names in their own right and would not provide open access to all registrars. Therefore, applicants are attempting to circumvent ICANN's Code of Conduct and New Registry Agreement through exemptions that were not intended for them.

For these reasons, AXA hopes that ICANN will consider requiring applicants to either open the gTLDs or withdraw these gTLD applications providing applicants with a full refund.

Very truly yours,

AXA Executive