July 29, 2014

Re: The .ECO Top-Level Domain (Application ID 1-912-59314)

Dear ICANN,

The Natural Resources Defense Council (NRDC) is an environmental non-profit organization that combines the grassroots power of 1.4 million members and online activists with the courtroom clout and expertise of more than 400 lawyers, scientists and other professionals. NRDC was founded in 1970 by a group of law students and attorneys at the forefront of the environmental movement. It is now headquartered in New York, with offices in Washington, D.C., Chicago, Los Angeles, San Francisco and Beijing.

NRDC’s purpose is to safeguard the Earth: its people, its plants and animals and the natural systems on which all life depends. Our six main priorities are: curbing global warming and creating a clean energy future, reviving the world’s oceans, defending endangered wildlife and wild places, protecting our health by preventing pollution, ensuring safe and sufficient water, and fostering sustainable communities.

As a member of the global environmental community we are writing to express support for the creation of the “.eco” top level domain as proposed by Big Room Inc. We request that this letter be forwarded to the Community Priority Evaluator and published to the ICANN correspondence page.

The community to be served by Big Room’s application - and the community that would be implicitly targeted by any application for “.eco” - is an alliance of diverse, long-established, and internationally recognized environmental institutions with millions of members worldwide.

Formal international evidence of this community dates back to 1948 with the founding of the International Union for the Conservation of Nature. The community has come together and organized itself with respect to specific issues over the years through a variety of formal and informal alliances including, for example, the Climate Action Network, 350.org, the Antarctic and Southern Ocean Coalition, and since 1972, the United Nations Environment Programme.

The .ECO Community Organization reflects the community’s long-standing reliance on and use of the multi-stakeholder model to pursue community-wide goals, and is the appropriate voice to ensure that .ECO operates in furtherance of the goals, values, and interests of the environmental community.

The "ECO" label has long been used to associate individuals, organizations, and activities committed to respectful, responsible, and sustainable use of the environment. Because use of the "ECO" label is widely understood as a representation of association with the community’s goals and values, and in order to avoid consumer confusion, it is imperative policy setting responsibility for the TLD be invested in a representative organization that can provide stable and ongoing environmental community input and oversight.

We look forward to participating in the long-term governance of this community resource, for the greater good.

Sincerely,
Frances Beinecke
President, NRDC