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Geneva, 6th October 2014

Subject: Call for a moratorium on the .health and better Safeguards for .health

Dear President

The recent article on US National Public Radio (NPR) "Will .health make it more likely that you'll get scammed?" refers to the serious consequences that could come about from the unregulated use of health-related domain names such as .health, .clinic and .doctor. The article captures some of the concerns of civil society and health-related industries worldwide as well as those reported by the ICANN independent objector and by non-profit entities such as Health On the Net Foundation, Save the Children, the European Commission, the International Society for Telemedicine and eHealth, the International Medical Informatics Association, the World Medical Association, and many others.

Decisions taken by ICANN within the current round of new gTLD delegations will determine the future of the health Internet in its entirety and will beyond doubt impact worldwide public health. Health information, data, products and services have an important and unique status on the Internet. It is imperative that operators of health domains manage them for and in the interest of the public. Unregulated delegation of health and medical top-level domains will open doors as noted in the NPR article to 'anti-smoking' health websites owned by tobacco companies or 'cancer treatment' websites owned by "unscrupulous vendors" cloaked with the faux respectability of the health domain name.

We believe that it is the civic and moral duty of ICANN to delay the delegation of the top-level Internet domain name .health and it is imperative that this is done. The Health on the Net Foundation (HON) and the International Medical Informatics Association (IMIA), both international non-profit organizations and the World Medical Association (WMA) are deeply concerned about the possibility that ICANN could assign these TLDs without adequate assurances that they will be operated in the interest of global public health. The safeguards proposed by the GAC offer insufficient protection, and numerous letters from the health community to ICANN and the GAC have reiterated that WHO guidelines² and other initiatives such as the HON code³ - developed by stakeholders in the health community - must be considered as a foundation for a reliable health Internet.

³ http://www.hon.ch/HONcode/Webmasters/Conduct.html

¹ http://www.npr.org/blogs/health/2014/09/26/351416992/will-dot-health-make-it-more-likely-that-youll-get-scammed

² http://www.who.int/ehealth/programmes/governance/en/index3.html

It is essential that ICANN relies on the health community to lead the process to produce a new set of safeguards or principles for health. We note that the NPR article refers to an expert working group consisting of a "panel of prominent members of the online health community" which would be involved in discussions on the governance of the online health arena. As a globally recognized leaders and key stakeholders in the online health community, we stand ready to assist efforts to establish a better framework for a successful health domain name.

HON Foundation is dedicated to the promotion of transparent and trustworthy health information on the Internet and offers tools to the online community of healthcare consumers and information providers. One of these is the HONcode certification, established by a stakeholder consensus process as a standardized certification verifiable in real time. HON collaborates with organizations such as the European Union, the International Organization for Standardization (ISO), the Medical Council Research in South Africa, and the Federal Office of Public Health of Switzerland to achieve HON's vision of providing global unrestricted access to quality health information.

The World Medical Association (WMA) is an international and independent confederation of free professional Medical Associations, therefore representing physicians worldwide. WMA counts 106 National Medical Associations and represents approximately 10 million physicians worldwide.

The International Medical Informatics Association (IMIA) is a global association of 60 nationally-based health and biomedical informatics associations, and more than 50 Academic and Corporate Industrial Members, drawing on the expertise of more than 80,000 individuals. IMIA provides leadership and expertise to the multidisciplinary, health focused community and to policy makers, to enable the transformation of healthcare in accord with the world-wide vision of improving the health of the world population.

We would very much like to discuss these issues with you at the earliest opportunity. Thank you for your consideration.

Yours sincerely,

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Health On the Net Foundation is an NGO in Special Consultative Status with the Economic and Social Council of the United Nations