



napa valley vintners

August 8, 2013

Steve Crocker, chairman
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive
Suite 300
Los Angeles, CA
90094-2536

SUBJECT: Generic Top Level Domains (gTLDs)

Dear Mr. Crocker:

The Napa Valley Vintners, the non-profit trade association representing nearly 500 Napa Valley wineries, is concerned with how the Internet Corporation for Assigned Names and Numbers (ICANN) expansion of generic top level domains may negatively impact our association's ability to protect the Napa Valley name from fraudulent use.

A prestigious place that has earned a worldwide reputation for producing top quality wines, the Napa Valley wine industry accounts for an annual economic impact on the US economy of more than \$50 billion annually and tens of thousands of jobs.

Wine is an agricultural product inextricably tied to its place of origin. The Napa Valley Vintners (NVV) aggressively works to ensure labels on bottles of wine are truthful and accurate as to the appellation of origin of that wine. Consumers rely on this information to make informed purchasing decisions. We have had to fight to protect our name from misuse both in the US and around the world from those that would like to trade on our renown with inferior wines that derives from elsewhere.

As ICANN prepares for the largest-ever expansion of the domain name system, the NVV is fearful of the new opportunities provided therein by nefarious actors intending to misappropriate the Napa Valley brand, specifically as it relates to ".wine" and even ".vin."

It is our understanding that agreements associated with this expansion will prohibit operators of gTLDs from registering country and territory names recognized by the UN in front of the extensions ".wine" and ".vin." Hence, the registration of "US.wine" would be protected, but "Napa.wine" could be registered by any entity for any purpose. Protection is necessary at the secondary-level since registrars can commercialize the strings therefore allowing individuals or organizations to combine both gTLDs with a second-level domain name to create web addresses like "napa.wine" or "sonoma.wine" or many other combinations from both the US and other prominent wine regions around the world.

If this is allowed to go forward, our 500 winery members and legitimate wine producers worldwide would undoubtedly face cases of cybersquatting; damage to their regional brand; lack of consumer trust and potential overall loss of brand value.

Considering the clear importance that the names "Napa" and "Napa Valley" have for brand, region and industry, and give the lack of legal tools that would allow our organization to protect our names proposed by applicants to the ".wine" and ".vin" strings, we urge ICANN to take into consideration the advice

received from its Governmental Advisory Committee and not proceed with these strings beyond initial evaluation.

As consumers turn more frequently to the internet for information, the NVV believes that adequate safeguards need to be put in place to protect wine growing place names before approving ".wine" and ".vin."

If we can have a role in shaping this policy decision, or be otherwise helpful, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Cakebread". The signature is fluid and cursive, with a large loop at the end.

Bruce Cakebread
President
Napa Valley Vintners Board of Directors

Copy: ICANN President & CEO Fadi Chehade'
Governmental Advisory Committee Chair Heather Dryden
Suzanne Radell, senior policy advisor, National Telecommunications & Information Administration
US Representative Mike Thompson