



August 9, 2013

Mr. Fadi Chehadé
President and CEO
Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094

Dear Fadi:

On behalf of the Association of National Advertisers (ANA), I write to express our support for ICANN's solicitation of public comments on ICANN's Proposal to Mitigate Name Collision Risks, issued on August 5.

The report cited in this solicitation, as well as concerns raised by ANA and others involved with gTLD issues, raise significant issues that are highly important to the stability and security of the Internet. In addition, the report itself states that, "the delegation of almost any of the applied-for strings as a new TLD label would carry some risk of collision." Though perhaps varying in their impacts, the possibility of name collisions and their effects raise very technical issues that even the most sophisticated companies and other interested stakeholders must take time to assess.

The 21-day comment period proposed by ICANN for the receipt of comments on these very important matters is wholly inadequate. The limited time period, the difficulty of properly analyzing impacts and ICANN's proposed mitigation steps, and the mere reality of personnel absences due to summer vacations dictate that it will be virtually impossible for interested parties to be able to conduct the analysis and submit comments within the time provided.

Consequently, ANA requests that the period for filing such comments be extended, and that comments be eligible to be received until November 1 (with reply comments eligible to be received until November 22). This extension should permit sufficient analysis and participation by those most likely to be affected by these potentially harmful name collisions.

I request that this letter be posted on ICANN's website at the appropriate place so that all stakeholders are aware of our communication to you.

Thank you for considering an extension of the period for filing comments. Please do not hesitate to contact me if you would like additional information on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Jaffe". The signature is fluid and cursive, with the first name "Dan" and last name "Jaffe" clearly distinguishable.

Dan Jaffe
Group Executive Vice President
Association of National Advertisers