



February 26, 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 "Closed Generic" gTLD Applications and the Revised New gTLD Registry Agreement including Additional Public Interest Commitments Specification (PICS). There are, as you know, varied perspectives on these matters, and we think it is important that affected stakeholders have the opportunity to contribute to ICANN's consideration.

These issues will have significant impacts on trademark holders and consumers alike. Undeniably, these topics should have been considered earlier, during the development of the gTLD program. However, at this stage, it is essential that ICANN receive comments on (among other aspects) cost implications and whether the award of a generic term as part of a closed registry will benefit consumers or mislead them. There are differing points of view, and sufficient consideration must be given to all of the views expressed during ICANN's comment periods.

The initial comment period for the Revised New gTLD Registry Agreement including PICS closes on February 26, and the reply comment period closes on March 20, 2013, which we note is later than the March 13 deadline for filing objections. With regard to closed generic gTLDs, the initial period for comments closes on March 7, just a few days before the objection filing deadline. Entities considering filing objections will necessarily be affected by the comments received during these periods, and by the PICS filed by new gTLD operators. Some potential objectors may find their concerns resolved, while others may find their concerns heightened. Some entities may determine there are grounds for objection only after these comments are submitted. In particular, any change in the treatment of closed generic gTLDs could materially change the need for and content of potential objections.

Consequently, ANA requests that the period for filing such objections not close until at least 45 days after ICANN's final determinations regarding closed generic gTLDs. This will permit all participants to review any comments filed, consider determinations that ICANN may make in these matters, and have the opportunity to evaluate the potential impacts on consumers and brandholders. It is not reasonable to expect participants to make decisions that have significant implications without the benefit of all available information.

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

Sincerely,



Dan Jaffe
Group Executive Vice President
Association of National Advertisers

C:

- The Honorable Rebecca Blank, Acting Secretary and Deputy Secretary, U.S. Department of Commerce
- The Honorable Jon Leibowitz, Chairman of the Federal Trade Commission
- The Honorable Julie Brill, Commissioner of the Federal Trade Commission
- The Honorable Lawrence Strickling, Assistant Secretary for Communications and Information and NTIA Administrator, U.S. Department of Commerce
- Bruce Andrews, Chief of Staff, U.S. Department of Commerce
- Shaundra Watson, Counsel for International Consumer Protection, Office of International Affairs, Federal Trade Commission
- Fiona Alexander, Associate Administrator, National Telecommunications & Information Administration, U.S. Department of Commerce
- Akram Atallah, Chief Operating Officer, Internet Corporation for Assigned Names and Numbers
- Karen Lentz, Operations & Policy Research Director, Internet Corporation for Assigned Names and Numbers
- Daniel Halloran, Deputy General Counsel, Internet Corporation for Assigned Names and Numbers