

18 November 2013

Board of Directors
Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

Dear ICANN Board of Directors,

With this letter, Afilias Limited adds its concern for the consideration of applications for “corporate identifier” New gTLDs — including .LLP, .LLC, .LTD, .SARL, .SRL, .INC and .LTDA — whose operators intend to limit their availability by geography.

In its Beijing Communiqué, the Government Advisory Committee (GAC) outlined its desire for corporate identifiers to be regulated; however, it did not outline a rationale or a desire for geographic regulation.

Afilias wishes to see corporate identifiers that are available in all countries where such terms are legally used and recognized, and will be welcomed as relevant to local businesses, regardless of geography. Furthermore, applicants for these TLDs that claim to represent these corporate communities by narrowly defining eligible registrants by geographic lines have clearly ignored the global scope of these TLDs. Any attempts to limit the availability of corporate identifier domains by geography is discrimination that will likely have the effect of stifling Internet innovation, the opposite of the intention of ICANN's New gTLD Program.

Thank you for your consideration.

Sincerely,



John L. Kane
Vice President, Corporate Services