April 7, 2014

Dear ICANN New gTLD Program Committee Members
Dear ICANN Board Members
Dear Members of the ICANN's Governmental Advisory Committee
Dear Country Representatives of the ICANN's Governmental Advisory Committee:

The Santa Barbara Vintners represents the grape growers and wine producers based in Santa Barbara County, California. The mission of the Santa Barbara Vintners it to promote and protect the Santa Barbara County wine region and its five associated American Viticulture Areas (AVA.) In addition, we are a proud signatory, along with eighteen other wine regions, of the Joint Declaration to Protect Wine Place & Origin.

The Declaration to Protect Wine Place & Origin is an alliance of quality wine growing regions from around the world that seek to increase the protection of wine labels and the integrity of wine place names, which are fundamental tools for consumers to identify the special wines of great winegrowing regions. All regions that have signed the Declaration are committed to educating consumers about the importance of location and ensuring that wine growing place names are protected and easily identifiable is central to this effort. The Declaration information can be found at www.protectplace.com.

We are concerned that the new .WINE and .VIN gTLDs may negatively impact our organizations ability to protect again fraudulent use of wine region names and the wineries we represent. When it comes to wine, location matters. Our wine growing places are unique and these terms are understood by consumers to denote the origin and the quality of products produced in a special geographical area.

Following the applications of .WINE and .VIN to proceed through the normal evaluation process without additional safeguards would seriously undermine the protection consumers worldwide
expect. The protection of wine growing region names also serves the public interest because of the particular risks of fraudulent misuse of these terms which the Signatories regularly witness. Internet users would indeed be deceived into believing they are buying a genuine product with specific qualities and characteristics, when they are in fact getting an imitation.

We note that, to date, none of the .WINE and .VIN applicants has unequivocally included in its application appropriate safeguards for the protection of wine growing place names. We request the ICANN and the GAC grant adequate protection to all wine growing regions. It is indeed necessary for the Signatories to ensure that, if the extensions are delegated, there are additional safeguards around the .WINE and .VIN domain names with protection for all wine growing places names at the second level.

Thank you for considering our request.

Regrets,

Morgen McLaughlin
Executive Director