

**From:** <Reynolds>, Leslie

**Date:** Friday, 26 July 2013 21:56

**Subject:** Resolution by the National Association of Secretaries of State Regarding the Issuance of New gTLDs with Corporate Identifiers

Dear ICANN Board Members:

The members of the National Association of Secretaries of State (NASS) recently met in Anchorage Alaska for our 2013 Summer Conference. At that meeting, our members passed the [NASS Resolution of Recommendation to the International Corporation of Assigned Names and Numbers \(ICANN\) for Issuance of Corporate Internet Extensions.](#)

As we have stated in numerous [letters to ICANN](#) and [GAC](#) over the past year and a half, both from NASS and from individual Secretaries, we have concerns regarding the issuance of the extensions .INC, .LLC, .CORP and .LLP. We believe these extensions should only be awarded to entities that are appropriately registered and in good-standing with the Secretary of State or other appropriate state agency. To do so otherwise could invite fraudulent business registration, business identity theft and consumer confusion. We understand that GAC came to a similar conclusion recently and urged ICANN to conduct extra due diligence when working with these extensions.

Our resolution urges ICANN to adopt the GAC recommendations and only award these extensions with appropriate safeguards and restrictions in place.

Thank you for your attention to this matter. Please feel free to contact me if you have any questions.

Sincerely,  
Leslie Reynolds

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## **Resolution of Recommendation to the International Corporation of Assigned Names and Numbers (ICANN) for Issuance of Corporate Internet Extensions**

WHEREAS, the National Association of Secretaries of State (NASS) is an organization whose members include Secretaries of State and Lieutenant Governors of the 50 U.S. states and territories; and

WHEREAS, the majority of members are responsible for the administrative oversight of business entity registration processes in their respective states; and

WHEREAS, the International Corporation of Assigned Names and Numbers (ICANN) is in the process of awarding new Internet extensions that include business entity endings, including .INC, .LLC, .LLP and .CORP; and

WHEREAS, NASS and its members have followed this process closely and have expressed concerns regarding the potentially negative impacts of issuing generic gTLDs as corporate extensions, which we believe do not have enforceable safeguards to protect against misuse and could ultimately have a harmful effect on entities that are legally registered in the U.S. ; and

WHEREAS, NASS and many of its members have previously expressed in numerous letters to ICANN that these extensions may be unnecessary and irresponsible, but if allowed, should only be awarded to entities that are appropriately registered and in good-standing with Secretary of State or other state filing offices of jurisdiction; and

WHEREAS, there is a growing national concern relating to fraudulent business registration, business identity theft, online consumer protection and consumer confusion; and

WHEREAS, if these extensions were to be awarded without enforceable safeguards, it could allow anyone to operate a .INC, .LLC, .LLP or .CORP website, regardless of their actual business registration status/entity type; and

WHEREAS, the Government Advisory Committee to ICANN has issued advice in regards to the necessity of safeguards and restrictions on these particular Internet extensions and we believe these safeguards and restrictions are only enforceable in the community application process;

NOW, THEREFORE, BE IT RESOLVED THAT the National Association of Secretaries of State (NASS) recommends that if these extensions are approved, then ICANN should adopt the GAC recommendations and award the .INC, .LLC, .LLP and .CORP extensions with appropriate safeguards and restrictions designed to protect the U.S. business community and consumers.

Adopted the 21<sup>st</sup> day of July, 2013  
in Anchorage, AK

EXPIRES: Summer 2018