



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

## Proposed Service

Name of Proposed Service:

*.jobs - 01*

Technical description of Proposed Service:

*ICANN Registry Request Service*

*Registry Name: Employ Media LLC*

*gTLD: .JOBS*

*Proposed Service*

*Name of Proposed Service:*

*Release of Initially Reserved Two-Character Domain Names*

*Technical description of Proposed Service:*

*In pure technical terms, Employ Media LLC proposes to simply allow registration of two-character strings according to the current rules of registration in the .JOBS registry. This is a simple extension of the available namespace, anticipated by Appendix 6 of the .jobs registry agreement. As such, it is not a "New" or "Proposed" Registry Service which requires a material change to the .jobs registry agreement. This extension of the namespace can be effectuated by ICANN invoking its authority under Appendix 6 to expressly authorize changes to the Appendix in writing.*

*By way of background, since inception, the .JOBS registry has (per its Appendix 6) initially reserved all two-character strings at the second level, such as GE.JOBS, HM.JOBS, and 3M.JOBS.*

*Many two-character strings are commonly known trade or company names, pre-dating the Internet, of employer organizations, some of which are the largest employers in the world. See, for example, GE.com, HM.com and 3M.com. Many of these employer organizations have contacted Employ Media and expressed their desire to register a two-character .jobs domain. A typical example is General Electric, whose desire to register GE.jobs is set forth in the attached letter to Employ Media dated September 29, 2005. Yet GE is only an example of one such employer organization; other exemplary employer organizations regarding which we have received interest about two-character registrations include, but are not limited to:*



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

*Boise Cascade (bc.jobs)*  
*H&M (hm.jobs)*  
*3M (3m.jobs)*  
*Hewlett-Packard (hp.jobs)*  
*Fifth-Third Bank (53.jobs)*  
*General Motors (gm.jobs)*  
*American Airlines (aa.jobs)*  
*Johnson & Johnson (jj.jobs)*  
*British Petroleum (bp.jobs)*  
*University of Oklahoma (ou.jobs)*  
*Virginia Tech (vt.jobs)*  
*Boston University (bu.jobs)*  
*Volkswagen (vw.jobs)*  
*American Eagle (ae.jobs)*  
*Burger King (bk.jobs)*  
*Waste Management (wm.jobs)*  
*Baldwin Wallace University (bw.jobs)*  
*The University of Kansas (ku.jobs)*  
*University of Cincinnati (uc.jobs)*  
*Texas Instruments (ti.jobs)*  
*Union Pacific (up.jobs)*  
*McGraw-Hill (mh.jobs)*  
*Becton, Dickinson & Co. (bd.jobs)*  
*Barnes & Noble (bn.jobs)*

*The current discrimination against two-character trade names is blocking some of the largest employers in the world from utilizing their most commonly known trade name in the form of a .JOBS URL. Unlike other members of the .jobs Community, who are allowed to market their most commonly known name in .jobs, these entities are currently denied the ability to market employment opportunities to job seekers under their most commonly known name.*

*Appendix 6 further provides for release of two-character strings if the Registry Operator implements measures to avoid confusion with corresponding country codes. The current rules of registration within .jobs provide such measures, particularly as such relate to "companyname" requirements. The release of two-character strings to employer organizations, under applicable .jobs registration rules, facilitates use, by employers, of the URL for self-promotion relating to jobs or company-related human resources materials. This is inherently a "measure to avoid confusion with corresponding country codes", as it is unlikely that users will confuse company job ads with a country (such as the lack of confusion that would exist*



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

*between General Electric promotions for jobs and the country of Georgia).*

*This lack of confusion is duly noted by GE in the attached letter: "We do not see how this would present any type of confusion between ge.jobs and url's for the country of Georgia that end in .ge. To us they are a dot apart so we don't understand why anyone would be confused." The same would be true for all two-character "companyname" domains in .jobs; "companyname" .jobs registrations denote that the domain is for an employer, not a country.*

*The GAC has previously noted the WIPO II Report statement that "If ISO 3166 alpha-2 country code elements are to be registered as domain names in the gTLDs, it is recommended that this be done in a manner that minimises the potential for confusion with the ccTLDs." The differentiation of the .JOBS string, as specified in Appendix S of the .JOBS Registry Agreement, makes it clear that registrations within the .JOBS sTLD have a different purpose than registrations in other TLDs. Accordingly, there should be no confusion between two-character registrations at the second level within .JOBS and any corresponding two-character country codes.*

[Appendix A \(jobs-GE.pdf\)](#)

## Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

*Employ Media LLC consulted with the Society for Human Resource Management (SHRM).*

*What were the quantity, nature and content of the consultations?:*

*We specifically requested SHRM's opinion with regard to 2 questions:*

- 1. Would the practice of allowing the registration of two-character names in .JOBS be consistent with the .JOBS Charter?*
- 2. Would the .JOBS Charter require modification to accommodate the release of two-character registrations?*



# ICANN Registry Request Service

**Ticket ID: U1V2R-8Y5M0**

**Registry Name: Employ Media LLC**

**gTLD: .JOBS**

**Status: ICANN Review**

**Status Date: 2007-03-13 08:07:14**

**Print Date: 2007-03-13 08:07:20**

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

*SHRM provided the following response, in summary:*

*The .JOBS Charter defines the requirements for acquiring a domain name in the .JOBS TLD. Length of characters is not one of the requirements in the Charter. Employ Media should take appropriate steps to ensure it is not acting arbitrarily with regard to registration practices and Charter interpretation. A perception could exist that Employ Media is denying the Community even-handed registration practices by inhibiting Community members' ability to acquire their commonly known business name on the seemingly arbitrary basis of string length. This perception should be remedied. We do not feel that a likelihood of confusion exists with the registration of two-character domain names in .JOBS within the rules and spirit of the Charter as it is currently written.*

b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

*.JOBS accredited registrars, of which there are over 30, already support the .JOBS Charter and second level registration requirements.*

*Employ Media made a special effort during our launch to educate our registrars regarding our application rules, particularly including our inability to register two-character names. In light of this education and awareness, it is not surprising that registrars are not inquiring regarding this issue. The majority of inquiries and interest in two-character names has come to us directly from the Community which we serve, and particularly from large employers expressing their disappointment or frustration at their inability to submit for verification their particular two-character trade name in .jobs.*



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

*We do not believe that it is materially necessary to discuss the release of two-character registrations in .JOBS with other ICANN constituency groups.*

*It is noteworthy to mention that all inquiries we have received have been directly from businesses. Further, we have noticed a very recent preliminary recommendation within the Reserved Names Working Group of ICANN's GNSO that includes, for example, ICANN Business Constituency participation:*

*"The existing registry agreement provisions provide a mechanism for the release of two-character names. In addition, registries may submit a proposal for the release of names through the process for new registry services (also known as the "Funnel"), which was approved as a GNSO Consensus Policy on 8 November 2005 (<http://www.icann.org/minutes/resolutions-08nov05.htm>) and implemented 25 July 2006 (<http://www.icann.org/announcements/rsep-advisory-25jul06.htm> and <http://www.icann.org/registries/rsep/rsep.html>). We recommend that this release mechanism be permitted as to one- and two-letter and/or - number ASCII names (all domains subject to this Report, excluding those which contain symbols and IDNs)."*

*While the above preliminary recommendation is not necessarily an endorsement for this specific proposal, it does reflect favorable support from within ICANN's constituency membership for this proposal.*

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

*End users (i.e. registrants) in .JOBS are employer organizations. The actions by Employ Media to 1) request SHRM advice and 2) take this action through ICANN is the result of feedback we have received from the .JOBS Community, notably from employer organizations wishing to acquire their two-character .JOBS trade name. Put simply, this action through ICANN is the result of Community feedback that we are responding to, as we are obligated to do.*



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

*Employer Organizations with the desire to promote their commonly known two-character trade name to job seekers would endorse this service.*

f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

*It is possible that some ccTLD managers may object to the introduction of this service on principal grounds. We do not think that any such objections can reasonably be based on risk of confusion between the two-character name and the ccTLD for reasons stated above.*

*Any government, acting as an employer organization, is free to submit an application for their appropriate and available two-character name. Governments are legitimate employer entities. As part of normal operations, domain name requests from Government employers are treated in the same manner as any other application from a qualified applicant.*

*Thus, it is important to appreciate that domain name applications in .jobs are not processed in real time. Rather, an application is placed in the .jobs zone in pending/create status while Employ Media performs its verification process. While a domain name application is in pending/create status, no further applications for that same domain name can be accepted (as the domain name is already in the zone, albeit in pending/create status). If the application is verified, then the status is changed to 'active.' If the application is not verified, the domain name is deleted from the .jobs zone, which permits another qualified applicant to apply for the same domain name.*

*In this manner .jobs applications are processed on a "first-come, first serve" basis, with no queue for additional applications for a domain that is already in the .jobs zone. As such, a government has just as much chance/access/ability to obtain a particular (and appropriate, under the registration rules of .jobs) two-character domain name as any other employer entity, whether such entity be a commercial entity, non-profit entity, educational entity, etc.*



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

## Timeline

Please describe the timeline for implementation of the proposed new registry service:

*The release of two-character names would happen as soon as possible, as ICANN can authorize such an implementation by written express authorization and no adjustments need be made to existing .jobs registration practices and procedures. Applications for two-character names would be accepted in the same manner as all other applications for .jobs names.*

*We have found that most valid potential registrants of two-character names already assume they are available, and are surprised when they find out that they are not "allowed" to acquire what they consider as their own two-character trade name, often times being the very same two-character domain they have been using at the second level in a different TLD for years. Our experience is that while those familiar with ICANN policies and procedures are aware of the two-character restriction and the origin for this restriction, the vast majority of businesses are actually unaware, requiring quite a bit of explanation that has generally not been very well received.*

*There is no potential problem with multiple companies applying for a single name. As two-character applications will be accepted in the same manner as all other applications, any first such application for a two-character name will place the name in pending-create status, which will have the effect of disallowing subsequent applications until the verification procedure has completed. The only operational difference from the status quo is that we will accept for verification two-character requests whereas today we do not.*

*There will be no string contention, just as there can not be string contention for any other .jobs domain name application. Please see the "first-come, first-serve" response to section "Consultation (f)." By design, two-character applications would fit into the current operating model of .jobs. The only operational difference from the status quo is that Employ Media would accept two-character applications, whereas today we do not.*

*After receiving notice from ICANN that this request has been approved, but before beginning to accept two-character applications into the .jobs zone, Employ Media will inform its registrars about its ability to accept two-character applications and will identify when such applications will begin to be accepted. This will be done with reasonably enough time to allow the registrars to inform their customers or further market .jobs domains at their own determination. Employ Media will create and release an international press release which educates regarding the acceptance of two-character domains in .jobs and further identifies when such applications will begin to be accepted. Employ Media will then send a copy of this press release to both the GAC and the CCNSO. Employ Media will inform SHRM of such approval for distribution to the global HR community. Employ Media will post similar information to its goto.jobs website prior to commencement of acceptance of two-character domains.*





# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

## Business Description

Describe how the Proposed Service will be offered:

*The registration of two-character names in .JOBS will follow existing registration practices, including conformance to the .JOBS Charter.*

Describe quality assurance plan or testing of Proposed Service:

*The quality assurance plan will be identical to existing .JOBS registration practices. There is no new software required for development thus not a need for a testing period. The basic functionalities required for the second level registration of two-character strings is proven in other TLD strings.*

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:

*n.a.*

## Contractual Provisions

List the relevant contractual provisions impacted by the Proposed Service:

*This extension of the namespace does not require any amendment to the .jobs registry agreement. Appendix 6 states in its preamble that two-character domains be reserved "[e]xcept to the extent that ICANN otherwise expressly authorizes in writing...". ICANN thus has the authority to implement this namespace extension by written authorization. Appendix 6 Section B, relating to two-character labels, will be impacted. This Section facilitates proposal of this extension of the namespace "based upon its implementation of measures to avoid confusion with the corresponding country codes." This Section may be invoked to implement this extension of the namespace.*





# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

What effect, if any, will the Proposed Service have on the reporting of data to ICANN:

*The release of the two-character names will not impact .JOBS reporting to ICANN.*

What effect, if any, will the Proposed Service have on the Whois?:

*The release of the two-character names will show in Whois in the same way as all other domain name registrations in .JOBS.*

## Contract Amendments

Please describe or provide the necessary contractual amendments for the proposed service:

*This extension of the namespace does not require any contractual amendments. Support for this extension of the namespace via express authorization in writing is found in the Preamble to Appendix 6 of the .jobs registry agreement, and further in Section B of the same Appendix.*

## Benefits of Service

Describe the benefits of the Proposed Service:

*The primary benefit is to enable an employer organization, one with a two-character commonly known trade name, to acquire the two-character domain in .JOBS to facilitate promotion as a URL in recruitment advertising to job seekers.*

## Competition



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

*No. By technical definition, this is really an expansion of the namespace, which itself is really just an extension of an existing registry service; i.e. the registry operation of allowing domain name registrations at the second level within its zone.*

How would you define the markets in which your proposed Registry Service would compete?:

*.JOBS operates strictly within the domain name registration market, managing a specific TLD zone that has been designated for recruiters to secure a domain name registration on behalf of their employer organization via .JOBS accredited registrars.*

What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

*Numerous existing ccTLD and gTLD registry operators currently offer two-character domain name registrations at the second level. None that we are aware of claim that a mission of their TLD is to target recruiters for the purpose of securing domain name registrations on behalf of their employer organization for recruitment motivations and objectives.*

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

*No.*

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.:

*The release of the two-character names does not require any additional vendors or contractors.*

Have you communicated with any of the entities whose products or services might be affected by the introduction



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

of your proposed Registry Service? If so, please describe the communications.:

*We are not aware of any entity whose product or services might be affected by the introduction of two-character registrations in .JOBS.*

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

*n.a.*

## Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

*No.*

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems:

*The release of two-character names will not affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems.*

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:



# ICANN Registry Request Service

Ticket ID: U1V2R-8Y5M0

Registry Name: Employ Media LLC

gTLD: .JOBS

Status: ICANN Review

Status Date: 2007-03-13 08:07:14

Print Date: 2007-03-13 08:07:20

*The RSTEP recently provided a thorough opinion to this question as it pertains to two-character registrations in a TLD zone (see <http://www.icann.org/registries/rsep/RSTEP-GNR-proposal-review-team-report.pdf>).*

*The RSTEP evaluation of the technical issues surrounding the use of two-character names in TLDs determined that there are no technical barriers to the release of two-character names within gTLDs. While the evaluation was performed in response to .name's request for two-character names, it is important to note that the RSTEP analysis regarding security and stability was not TLD-specific, and could be applied to all TLDs, including .jobs. This is particularly true with respect to concerns involving RFC 1535-type errors, for which the RSTEP conclusion would apply equally to .jobs as to .name.*

*We agree with the Board's reasons in approving the GNR proposal (see: <http://www.icann.org/minutes/prelim-report-16jan07.htm>).*

## Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

*There are no additional Intellectual Property considerations with the release of two-character registrations in .JOBS than are not already considered with all other domain name registrations in .JOBS.*

Does the proposed service contain intellectual property exclusive to your gTLD registry?:

No.

List Disclaimers provided to potential customers regarding the Proposed Service:

n.a.

Any other relevant information to include with this request:



# ICANN Registry Request Service

**Ticket ID: U1V2R-8Y5M0**

**Registry Name: Employ Media LLC**

**gTLD: .JOBS**

**Status: ICANN Review**

**Status Date: 2007-03-13 08:07:14**

**Print Date: 2007-03-13 08:07:20**

No.



# ICANN Registry Request Service

**Ticket ID: U1V2R-8Y5M0**

**Registry Name: Employ Media LLC**

**gTLD: .JOBS**

**Status: ICANN Review**

**Status Date: 2007-03-13 08:07:14**

**Print Date: 2007-03-13 08:07:20**

**Appendix {A(jobs-GE.pdf)}**  
**(Seen on Next Page)**



**Human Resources**

General Electric Company  
3135 Easton Turnpike  
Fairfield, CT 06828

Doreen.collins@corporate.ge.com

September 29, 2005

Tom Embrescia  
Chairman & CEO  
.jobs  
Employ Media LLC  
3029 Prospect Avenue  
Cleveland, OH 44115

Dear Mr. Embrescia,

Thank you for your time last week and your explanation of why there is a restriction on two character names for your new .jobs domain. However, we would like to reiterate our stance on this restriction. As you know General Electric is globally known as simply GE. Our commercial site for the company is ge.com. Our intent is to create a ge.jobs link for job seekers that would put candidates in touch faster with our ~3000 open positions that we display on our site daily.

The registry's explanation that since there is an existing country domain with .ge as the reason for the restriction doesn't appear to be a logical one. We do not see how this would present any type of confusion between ge.jobs and url's for the country of Georgia that end in .ge. To us they are a dot apart so we don't understand why anyone would be confused. In addition, it is difficult for us to select any other name besides GE. This is what we are globally known as and in fact is considered the fourth most valuable brand according to Forbes magazine.

We respectfully ask that you reconsider and allow two letter character names so we can take advantage of this wonderful opportunity to help job seekers around the world find employment via the .jobs domain process.

Sincerely,

A handwritten signature in cursive script that reads 'D Collins'.

Doreen Collins  
Manager, Global Staffing Quality Initiatives