



The Internet Corporation for Assigned Names and Numbers

18 December 2015

Heather Diaz  
Director, Compliance and Policy  
fTLD Registry Services, LLC  
600 13<sup>th</sup> Street, NW Suite 400  
Washington, DC 20005

Dear Ms. Diaz,

Thank you for your letter dated 26 October 2015 regarding concerns noted during the .BANK sunrise period. I appreciate your willingness to engage in informal discussion with staff to explore options for the anticipated launch of the .INSURANCE gTLD, and trust that this was helpful to your team as well.

As you may be aware, a key feature of the New gTLD Program reviews is the assessment of several rights protection mechanisms for the new space, including the Trademark Clearinghouse, Uniform Rapid Suspension (URS) system, and Post-Delegation Dispute Resolution Procedures (PDDRP). As part of the work for this review, ICANN staff compiled and analyzed quantitative and qualitative data on the usage of all rights protection mechanisms.

A draft of this report was published for [public comment](#) on 2 February 2015, and was updated and revised based on the feedback received. Much like the concerns mentioned in your letter, some of the comments received express that the inclusion of marks from some jurisdictions in the Trademark Clearinghouse may be problematic as it could lead to gaming of the Sunrise period. ICANN made note of these issues during upcoming reviews, which may also be taken under consideration in the policy development process in the [GNSO](#).

On 11 September 2015, the Revised Rights Protection Review [paper](#) was published and is expected to serve as an input to various planned activities such as possible policy discussions in the GNSO, an independent review of the Trademark Clearinghouse, as well reviews of the Program's impact on competition, consumer trust, and consumer choice.

In addition to feeding into these reviews, the RPM review paper has also been used to inform the [preliminary Issue Report](#), published on 9 October 2015 to obtain community input on whether to launch a GNSO policy development process to review all RPMs. The report



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addresses specific RPM topics derived from issues identified by the community in the RPM review paper, including the proof of use requirement, as well as possible options for work to be initiated by the GNSO in reviewing these processes.

With this in mind, we encourage you to participate in ICANN's policy development process as we greatly value the effective participation of all stakeholders. Again, we want to thank you for taking the time to write to us and for sharing your concerns. We appreciate your participation in the New gTLD Program and look forward to continuing to support you in serving your communities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Akram Atallah'. The signature is fluid and cursive, with the first and last names being the most prominent.

Akram Atallah  
President, Global Domains Division