



IPC Reply Comments on:  
Proposal to Mitigate Name Collision Risks  
September 17, 2013

The Intellectual Property Constituency (IPC) of the Generic Names Supporting Organization (GNSO) welcomes the opportunity to submit Reply Comments on ICANN's Proposal to Mitigate Name Collision Risks.

Introduction

Despite ICANN's stated intent to implement robust mechanisms for public consultation, the time period provided for public comments on this important issue is inadequate. Given the serious possibility of security risks and consumer confusion, interested and concerned parties require additional time to analyze the Interisle Consulting Group's report, ICANN's proposals, and to conduct and analyze data collected through their own efforts.

We support public comments that request more time to respond or additional information, such as those from the Business Constituency (BC), the ISPCP constituency, the Intellectual Property Owners Association, the Association for Competitive Technology, the American Insurance Association, Verizon, the General Electric Company and the Association of National Advertisers, although we do not take any position as to a specific extension. We remain disappointed that ICANN has not responded to or addressed these requests.

Furthermore, while we welcome ICANN's identification of the name space collision issue and proposals for mitigation, ICANN's actions at this late stage reduce external institutional confidence in ICANN, inject a degree of doubt into, and magnify potential security risks associated with the new gTLD process.

Thank you for considering our views on these important issues.

Respectfully submitted,

Intellectual Property Constituency (IPC)