



November 10, 2011

The Honorable John Bryson  
Secretary  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Secretary Bryson:

Congratulations on your recent confirmation.

I am writing on behalf of the Association of National Advertisers (ANA) and a growing coalition of national and international groups to express our strong opposition to the new Top Level Domain (TLD) program that was approved by the Internet Corporation for Assigned Names and Numbers (ICANN) on June 20, 2011.

Attached is a Petition which was signed by more than 80 major national and international industry groups representing almost every sector of the Internet economy. We all believe that the decision to approve the new TLD program does not promote consumer trust and does not benefit the public, as required in the Affirmation of Commitments between ICANN and the National Telecommunications and Information Administration (NTIA). The new TLD program, as currently configured, will have a severe negative impact on the not-for-profit and for profit brand community and the global electronic marketplace.

ICANN plans to begin taking new TLD applications on January 12, 2012, so time is clearly of the essence.

**For the reasons outlined in the Petition, we respectfully call on the Department of Commerce and NTIA to use all of its best efforts to persuade ICANN to postpone the opening of the Top Level Domain application window. The postponement will provide ICANN the time to adequately assess and demonstrate whether the benefits outweigh the cost of the program to the global Internet community.**

Numerous companies and industry groups have expressed concerns about the program over a period of several years but those concerns have been insufficiently addressed by ICANN. Also attached is a letter sent by the Association of National Advertisers (ANA) to

ICANN on August 4, 2011 outlining our specific concerns about the new TLD program. Since ICANN responded with plans to proceed full speed ahead with the program, we have reached out to other members of the not-for-profit sector, industry groups and companies to build a coalition in order to demonstrate the widespread and serious concerns of the Internet stakeholder community.

Clearly, even a cursory examination of this coalition's membership list demonstrates how widespread are the concerns of the worldwide business community. The issues that we raise will fall even harder on consumer groups, charities, foundations, and the myriad other entities that have even less financial ability to protect their institutional interests and that will be impacted by the rapid, unlimited opening of the Top Level Domain space.

We are not suggesting that there should never be an expansion of the TLD program. However, innovation should occur judiciously and responsibly. We should not contemplate such a sweeping expansion of the Top Level Domains without far more careful economic and technical study weighing the substantial costs versus any benefits of the program. The result of this inquiry should be a program that promotes the public interest and consumer trust. Unfortunately, the proposed ICANN program presently fails to meet these criteria. Therefore, further inquiry by the Department of Commerce and NTIA is not only desirable but critically necessary if we are to avoid significant harm to both consumers and the Internet.

Thank you for your consideration and we look forward to working with you on this issue of key importance to the entire global marketplace.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Liodice". The signature is fluid and cursive, with the first name "Bob" and last name "Liodice" clearly distinguishable.

Robert D. Liodice  
President and Chief Executive Officer  
Association of National Advertisers