



International Chamber of Commerce

*The world business organization*

Office of the President and CEO  
ICANN  
4676 Admiralty Way, Suite 330  
Marina del Rey, CA 90292-6601  
United States

19 January 2009

### **ICC concerns regarding business inputs and consideration by ICANN**

Dear Mr Twomey and Mr Dengate Thrush,

As you know, the International Chamber of Commerce (ICC) has actively participated in the ICANN processes and is an avid supporter of the ICANN model. ICC is the voice of world business championing the global economy as a force for economic growth, job creation and prosperity. ICC's advocacy has never been more relevant or important to thousands of member companies and business associations in every part of the world with the economic challenges we are all currently facing.

ICC has consistently stressed the importance of business voices being heard in all ICANN structures and processes. We are concerned that business priorities from across sectors and geographies are not being adequately considered as organizational and substantive discussions and decisions take place.

Since ICANN first posted the documents and the draft application guidebook for the new gTLD program for public comment in October, ICC has closely monitored the response. The future of the Internet is of immense importance to business, as it is one of the main pillars of the global economy. As such, the stability and security of the domain name system and the Internet is of prime importance to the business community.

Whilst applauding ICANN's goal of expanding the domain name system and Internet to increase competition and choice, we recognise that the unprecedented expansion of an unlimited number of new top-level domains (gTLDs), will bring with it many new challenges. It is therefore essential that all stakeholders have an opportunity to participate in this process in a meaningful way, and the opinions expressed are afforded due consideration before moving forward.

The opportunity to comment has been appreciated by ICC and its members, many of whom have posted comments either independently or through associate groups. This consultative process has had an unprecedented level of input from the business community, reflecting the

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importance they place on this issue. This is not surprising given the potential risks for global business, unless steps are taken to minimise the risks, challenges and costs that could be imposed on industry through the implementation of the current approach.

The extensive level of comments posted by the business community has recently become the subject of discussion within the trade press, during which ICANN staff have offered opinions. Comments made during these exchanges have provided little reassurance to business that their concerns will be given adequate consideration by ICANN before moving forward.

The importance of the Internet to the business community and its role of being an enabler for the global economy that will benefit societies across the world cannot be overstressed. Without elaborating on the detailed submissions made by member organisations, ICC would like to urge that the issues raised are given serious consideration and not lightly dismissed as being representative of just one set of stakeholders.

ICC's long standing message has emphasized the need for broader business participation in ICANN structures and processes. It has also underscored the need for responsiveness to business interests in the policy development processes, ICANN organizational reforms and the transition. Lack of appropriate consideration of business inputs in this particular consultation would be contrary to those priorities, and fly in the face of the broad support that business has extended to ICANN at this crucial time.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Moir', written over a light pink rectangular background.

Gordon Moir, Chair  
Task Force on Internet & Telecoms  
Infrastructure and Services (IT IS)

A handwritten signature in black ink, appearing to read 'D. Appasamy', written over a light pink rectangular background.

David Appasamy, Vice Chair  
Task Force on Internet and Telecoms  
Infrastructure and Services (ITIS)