



Sept. 26, 2012

**To:** To the ICANN Board and CEO, GAC Members, Evaluators, the Independent Objector and Members of the ICANN Community

**Re:** ICANN's Generic Top Level Domains

Dear Dr. Crocker, Mr. Chehadé, Ms. Dryden, Mr. Chalaby, Governmental Advisory Committee Members, Independent Objector, gTLD Application Evaluators and the ICANN Community:

I am writing to express Consumer Watchdog's concern over the blatant attempts by such companies as Google and Amazon to buy control of huge swaths of the Internet by purchasing generic Top Level Domains through the Internet Corporation for Assigned Names and Numbers (ICANN) and operating them as closed domains for their own use.

We believe the plans by Google and Amazon are extremely problematic and call on you to deny their applications. It is one thing to use a Top Level Domain name that is associated with your brand name. In Google's case that might be .Google or .YouTube or .Android. Similarly it makes sense for Amazon to acquire .Amazon or .Kindle. But, that is not what they are seeking.

Google, through its subsidiary Charleston Road Registry Inc., has ponied up \$18.7 million in its application to buy 101 domain strings like .eat, .buy, .book, .free, .web, and .family. Amazon is close behind the Internet giant, applying for 76 domain strings including such names as .free, .like, .game, and .shop.

Generic words used in a generic way belong to all people. However, if you allow individual registry operators like Google and Amazon to segregate and close-off common words for which they do not possess intellectual property rights and that are not associated with brand names you will allow them to circumvent nation-states' entrenched legal processes for obtaining legitimate and recognized trademark protections.

Moreover, if these applications are granted, large parts of the Internet would be privatized and become walled gardens. It is one thing to own a domain associated with your brand, but it is a huge problem to take control of generic strings and operate them for your own use.

Both Google and Amazon are already dominant players on the Internet. Allowing them further control by buying generic domain strings even if they say they would operate some of them in an open manner would threaten the free and open Internet that consumers rely upon. Consumer Watchdog urges you not to grant these outrageous applications but rather ensure that the Internet continues its vibrant growth while serving the interests of all of its users. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Simpson".

John M. Simpson, Privacy Project Director