Subject: Business Constituency comment on Release of Country and Territory Names in .DVAG, .TUI,

.SPEIGEL, .ALLFINANZ and .FLSMIDTH

Date: Wednesday, February 18, 2015 at 12:13:20 PM Eastern Standard Time

From: Steve DelBianco

To: comments-ctn-release-tlds-06jan15@icann.org

The Business Constituency ("BC") appreciates the opportunity to provide comments on proposed amendments to the .DVAG, .TUI, .SPEIGEL, .ALLFINANZ and FLSMIDTH registry agreements, per the Registry Services Evaluation Policy ("RSEP") by these five registries on 5 Dec 2014 and posted for public comment on 6 Jan 2015 at https://www.icann.org/public-comments/ctn-release-tlds-2015-01-06-en

In their RSEP requests, Registry Operators Deutsche Vermögensberatung Aktiengesellschaft DVAG, TUI AG, SPIEGEL-Verlag Rudolf Augstein GmbH & Co. KG, Allfinanz Deutsche Vermögensberatung Aktiengesellschaft and FLSmidth A/S seek the release of all country and territory names, as defined in Section 4 of Specification 5 of the Registry Agreement, at all levels of the .DVAG, .TUI, .SPEIGEL, .ALLFINANZ and .FLSMIDTH TLDs, respectively. The BC fully supports these requests.

Geographic domains in Dot-BRAND TLDs are an important business user issue (note that geographic names include spelled-out names as well as 2-character country codes). Dot-BRAND TLDs need to be able to use geographic names at the second level in order to safely market and sell their services to businesses, consumers, and users in multiple languages in different locations around the world.

We firmly believe that the release of country and territory names for Dot-BRAND TLDs will enhance security and trust in online commerce by permitting businesses to exercise more control over the security and stability of their customized websites. The use of geographic names at the second level will also help reduce abuse by reinforcing to consumers that official, legitimate communications come from the country-specific domain of a Dot-BRAND top level domain.

Finally, releasing these names will facilitate online commerce in developing nations by encouraging registries to create customized and localized content (in non-English languages) for consumers in such regions.

For all these reasons, the BC fully supports these requests and urges ICANN to amend the registry agreements for the .DVAG, .TUI, .SPEIGEL, .ALLFINANZ, and .FLSMIDTH TLDs accordingly.

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This comment was drafted by Laura Covington and was approved in accord with our charter.

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