



March 30, 2012

Mr. Rod Beckstrom
President & CEO
Internet Corporation for Assigned Names and Numbers
4676 Admiralty Way, Suite 330
Marina del Rey, CA 90292-6601

re: New gTLD Program

Dear Mr. Beckstrom:

The National Association of Secretaries of State (NASS) is an organization whose members include the Secretaries of State and Lieutenant Governors of the 50 states and territories. Many of our members are responsible for the administrative oversight of various business entity registration processes in their respective states.

We understand that the Internet Corporation for Assigned Names and Numbers (ICANN) is now accepting applications for a new expanded top level domain name program. We also understand that extensions such as .INC, .LLC, .CORP, and .LLP may be under consideration as new top level domain names.

While we have concerns about the use of these extensions, if ICANN considers approving these extensions, our members respectfully request that they be approved with restrictions that would attempt to protect legitimate businesses and consumers from confusion or fraud. All of the extensions heretofore referenced are recognized under state law as a means of identifying various types of business entities here in the United States. Therefore it is important to ensure that the website domain name for a business entity has some amount of fidelity when compared to the businesses legal registration with the state. We would point to .EDU as a good example of how effective restrictions on internet domain extensions can add to consumer confidence and trust.

The members of NASS believe these extension identifiers (.INC, .LLC, .CORP, .LLP) should only be extended to entities that are also legally and appropriately registered with the Secretaries of State, or the equivalent state agency. The entity purchasing a new domain name should be the same entity registered with a Secretary of State or equivalent state agency.

For the past few months, the members of the NASS Business Services Committee have been working to familiarize themselves with the new ICANN program and reviewing the potential impact these new extensions would have on existing and new businesses registering with the Secretary of State.

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We feel it is important that NASS members be consulted by DOT Registry or other applicants regarding policy related to the registering and identifying of businesses as this process moves forward. Please feel free to contact Ms. Leslie Reynolds, NASS Executive Director with any questions at 202-624-3525.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth Chapman", is written over a thin horizontal line.

Beth Chapman
Alabama Secretary of State
President, National Association of Secretaries of State

cc: Jamie Hedlund, ICANN Vice President of Government Affairs